

# Oldham

# Local Plan

**Local Plan Review: Issues and  
Options Comments and Response  
Schedule**

December 2023



**Oldham**  
Council



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## Introduction

Oldham Council is preparing a new Local Plan to replace the existing Joint Core Strategy and Development Management Development Plan Document adopted November 2011 and any saved policies from the Unitary Development Plan (UDP) 2006. Between 5th July and 29th August 2021, the council consulted the Local Plan Review: Issues and Options. It followed on from the first stage of the Local Plan Review consultation that was carried out in the summer of 2017, called the Regulation 18 Notification.

The Issues and Options document described the key challenges facing Oldham, set out broad issues and presented options and questions that we needed residents, businesses and interested parties in the borough to help us answer. To guide and get the most from the consultation we asked specific questions and presented spatial options within the document that we wanted responses on.

The Local Plan will guide development in the borough up to 2039.

This document summarises the comments received as part of the consultation along with the council's response.

If you would like further help in interpreting this document please contact the Planning Team on the following telephone number: 0161 770 4105.

You can also email the team at [SPI.Consultations@oldham.gov.uk](mailto:SPI.Consultations@oldham.gov.uk).

All documents connected with the Local Plan Review are available on the council's Local Plan Review webpage

([https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review))

An Integrated Assessment (IA) Scoping Report Update 1 was produced and published alongside the Issues and Options document (this incorporated Strategic Environmental Assessment / Sustainability Appraisal requirements. Comments received in relation to the Scoping Report can be found in the Scoping Report Update 2.?

## Summary of key issues raised and the council's response

In total 98 individuals and organisations submitted 856 comments. Table 1 below sets out a summary of the key issues that were raised during the Issues and Options consultation and how the council has sought to address these issues.

**Table 1: Summary of key comments received as part of the Issues and Options consultation**

**Vision for Oldham**

General support for the Vision which was considered positive in its intent and ambitions. Encouraging an appropriate scale of housing and employment growth and protecting the natural and historic environment were broadly supported. Comments highlighted the need to include reference to improving health and wellbeing for the residents of Oldham.

**Plan Objectives**

The objectives were generally supported, particularly in relation to the supply of housing to meet housing needs. Some amendments were suggested including that multi-functional sustainable drainage should be prioritised and including references to transport in objectives PO4, PO5, PO6 and PO7.

## Homes

Concerns relating to building homes on Green Belt.

Support for developing brownfield sites.

Concerns relating to an over-reliance on brownfield sites.

General support for providing for the needs of an ageing population.

Some support for all new homes to be built as lifetime homes however concerns around viability.

General support for housing mix, but some responses highlight the need to be flexible as a prescriptive mix can be restrictive as needs and demand will vary depending on location.

Some support for 30% affordable housing across the borough, however some developers/agents expressed the need to undertake assessments for need as well as the viability implications of providing an affordable housing requirement.

Mixed response around Vacant Building Credit (VBC).

Comments that the level of private rented accommodation should not be set as a policy requirement

Concern was expressed for the increase in Houses in Multiple Occupation (HMOs).

Mixed response to questions relating to custom and self-build with support for custom and self-build towards overall housing supply but acknowledgment that there can be challenges in delivery.

Support for a specific policy on the use of properties as children's homes.

A mixed response was received to the question relating to minimum density assumptions.

More clarity was sought in relations to centres and comments that residential density should be based on local character.

## Economy and Employment

Impact of online shopping on the economy must be considered.

Concerns of an oversupply of logistics warehousing due to Northern Gateway.

Mills should be considered on an individual basis in terms of employment use.

Oldham's Green New Deal and tackling climate change should be at the heart of the development of the economy and employment.

Support for a flexible approach to employment areas, sites considered on own merits and some site specific comments.

In relation to allocating employment land, only one comments was received there was support for a combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites.

Request that sites with heritage assets have Historic Impact Assessments and that sites in close proximity to SAC and SSSI's are assessed in Habitats Regulations Assessment.

Support for the inclusion of a policy that protects and promotes cultural venues. Suggestions for building on Oldham's tourism base.

Growing need for overnight/long stay accommodation in appropriate rural locations (log cabins, camp sites).

Need to promote our green areas.

Should support Northern Roots as a sustainable attraction for visitors as well as for the range of other environmentally friendly benefits it will bring.

Support for the retention of a farm diversification policy.

## Our Centres

Support for the distinction between the different centres in the borough.

Suggestions that the existing retail hierarchy should be replaced as it does not reflect the retail distribution of the area.

Suggestion that the type of housing that would be suitable for centres would be single person households and older people.

### **Addressing Climate Change**

Support for climate change policy to be intrinsically linked to wider policies in the Plan including those related to design of new development and the provision of green and blue infrastructure.

Suggestion that chapter could make reference to GMs Environment Plan targets.

Support for Modern Methods of Construction (MMC) and mapping out opportunities for renewable and low carbon energy though some developers consider a policy is unnecessary.

Support for policies managing surface water runoff which accord with either national standards or standards referenced in the Greater Manchester SFRA. Support for SUDs and using natural processes to mitigate flood risk.

Comments that the natural environment is important for mental health.

Concerns raised over the development of the Green Belt and Other Protected Open Land.

General support for Green Belt enhancement opportunities.

### **The Natural Environment and Open Land**

Mixed responses to the question of whether sites that have met Local Green Space criteria should be designated as such.

Some felt that sites not meeting the criteria should not be de-designated as Other Protected Open Land (OPOL).

Some OPOL sites put forward as needing safeguarding from future development.

Suggestion that the Accessible Natural Greenspace Standard (ANGSt) could be a useful tool.

### **Green Infrastructure**

Some comments advocated the need to protect ancient woodland.

Should use brownfield land rather than greenfield.

A mixed response to the options put forward to ensure that green infrastructure is embedded across the borough and in the built environment.

General support for biodiversity net gain to be delivered as close to the site as possible.

Support for net gain being delivered on local projects.

Mixed response in terms of whether a higher than minimum biodiversity net gain should be applied to developments.

General support for restricting the paving of front gardens. Some respondents favoured setting minimum garden requirements.

Varying responses in relation to open space, preferences for on-site provision and pooling.

Recommendations that decisions for open space provision are made based on evidence.

The National Park should be referenced in enhancing the access to the wider countryside.

Support for space for food growing new developments.

Support for a policy regarding the protection of trees.

### **The Built Environment – Historic Environment**

Most respondents agreed that the extensions to the Oldham Town Centre Conservation Area should be included on the proposals map. However, one respondent stated that the conservation area should not be extended.

Important policy areas specific to Oldham are the future use of textile mills and seeking to enhance Oldham Town Centre Conservation Area with the aim to remove it from the 'at risk' register.

Localised policies supported.

A mixed response was received to the question of the proposed policy approach to high, medium and low priority mills and mill clusters.

### **The Built Environment – Design**

Support for the production of a Local Design Code.

Some comments around detailed design policies needing to be flexible and not hinder development delivery or stifle imaginative high-quality design.

### **Transport and Improving Connectivity**

General support for suggestions to improve transport and connectivity.  
Additional key services could include digital connectivity (broadband and mobile phone).  
Suggestion that major developments should have access to all or the majority of services.  
Level of access should be high.  
General support for the principle of 20-minute neighbourhoods, although one commented that this is not practical in a rural environment such as Saddleworth.  
General support for all new development to provide EV charging points.  
Support for a standalone policy for utilising the Streets for All guidance.  
A policy may also be required that ensures that all access roads into new developments and all roads within new developments that are to be delivered by developers, are designed to be compliant with Streets for All principles. Support for Bee Network proposals to be identified on the proposals map.  
TfGM suggest that the proposals map shows the 'confirmed infrastructure' only (i.e. Oldham's sponsored schemes).  
Support for public transport pass as part of some new developments.

### **Communities**

Recognise the importance of protecting heritage assets and assets of community value.  
The council should commit to maintaining the register of assets of community value.  
Mixed responses in relation to Hot Food Takeaway question. Support for a policy which restricts the location of hot food takeaways within 400m of a school and in areas with high levels of obesity but another commented that proximity-based policies are weak and conflicting and that there should be no assumption that takeaway outlets will only sell cheap fast food.  
Health Impact Assessments should be mandated for all developments.  
Support for protecting suitable sites for potential future education facilities/services.  
Mixed response as to whether pubs should be included within the definition of community facilities.  
Community facilities should also include churches, libraries and schools.  
Support for Article 4 Direction in rural areas and social value in developments policy.  
Support for a policy outlining the agent of change principle.  
Support for separate policies relating to the local environment.

### **Infrastructure**

Financial contributions should be channelled into communities where the development occurs.  
Suggestion that policy be worded to support utility sites in Green Belt /Open Countryside for operational purposes.  
Support for policy seeking the provision of supporting necessary infrastructure.  
A policy that provides a formula and clarity over what planning obligations will likely be sought is supported. Suggestion that any policy should allow for flexibility and site-specific circumstances. Suggestion that the council produce a Planning Obligations SPD.

### **Monitoring**

A range of comments suggesting further indicators that should be included.  
Advice that monitoring indicators should meet the requirements of the Environmental Assessment of Plans and Programmes 2004 to included suitable monitoring indicators in the Sustainability Appraisal, Local Plan or post adoption statement.

### **Overarching**

Comments received relating to PfE and specific planning application which are separate to the Local Plan Issues and Options consultation.



More could be added to the Spatial Portrait - a brief narrative on the evolution of the borough's historic environment and the growth of the town during the 19th century. This will help provide a strong context.

The tables below set out a summary of the responses that were submitted as part of the Issues and Options consultation, they are grouped based on the thematic questions set out with the Issues and Options report.

## Vision for Oldham

Table V1: Responses submitted on the Vision and the council's response

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support respecting landscape types in paragraph 12.11, especially the Green Belt in Chadderton.	Noted.
Mrs Sharon Hibbert	Parish Clerk, Saddleworth Parish Council	There is no reference to encouraging physical health or sports facilities. Clarification sought - does it mean borough or town when referring to Oldham? Nothing in the vision relating to plastic pollution.	Noted. Vision amended to make reference to our residents having access to local community facilities and health and well-being provision and that they will have active and healthier lifestyles gained from access to active travel and green infrastructure. Waste is dealt with in Places for Everyone and JP-S7 Resource Efficiency as well as the Greater Manchester Joint Waste Plan ( <a href="#">Greater Manchester Waste Development Plan Document</a>   <a href="#">Greater Manchester Waste Development Plan Document</a>   <a href="#">Oldham Council</a> ). When referring to Oldham the Local Plan is referring to the borough of Oldham.
	Historic England	In general support of vision.	Noted.
Mrs Rose Johnstone		This plan is not realistic. Oldham does not work in a co-operative manner. Little is done to bring different communities together. Sholver gets left out of plans for Oldham. Need to come together to make Oldham a thriving community	Noted.

Name	Organisation Details	Summary of Response	Council's Response
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Comments link back to the Places for Everyone / GMSF vision and the direction that the Joint Plan is taking and asks if it is too late to review the change of direction.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mrs Jane Millet		Vision contains a number of points that are related to health, mental health, exercise, a great place to live and influences on climate change yet there are proposals to build on green land. Open spaces are an essential part of health, exercise and wellbeing and should be protected.	Noted. The Draft Local Plan includes Policy CO1 which sets out how the plan will protect our open spaces.
Mr M Coulter	Grasscroft Properties Ltd	Support the inclusion of a statement which encourages appropriate scale of residential and growth in areas that are best suited and most viable for housing. This is to be considered in areas with appropriate infrastructure, well located near town centres and transport. The vision should reflect the need to encourage development in sustainable locations to meet needs, whilst considering the viability of potential development in desirable areas.	Noted.
Cllr Howard Sykes	Oldham Council	Vision should refer to the improvement of mental health.	Noted. Vision amended to make reference to our residents having access to local community facilities and health and well-being provision and that they will have active and healthier lifestyles gained from access to active travel and green infrastructure.

Name	Organisation Details	Summary of Response	Council's Response
	Countryside Properties	Supports the inclusion of a statement which encourages appropriate scale of residential and growth in areas that are best suited and most viable for housing. This is to be considered in areas with appropriate infrastructure, well located near town centres and transport. The vision should reflect the need to encourage development in sustainable locations to meet needs, whilst considering the viability of potential development in desirable areas.	Noted.
Denise Luke		The vision is ambitious. Welcome the suggested improvements to transport, providing homes in the town centre, supporting local businesses to thrive and protection of Oldham's Green Infrastructure. Would like to see the vision state to provide enhanced health and wellbeing for the residents of Oldham.	Noted. Vision amended to make reference to our residents having access to local community facilities and health and well-being provision and that they will have active and healthier lifestyles gained from access to active travel and green infrastructure.
	Kellen Homes	Supports the inclusion of a statement which encourages appropriate scale of residential and growth in areas that are best suited and most viable for housing. The shortage of housing should be considered in areas with appropriate infrastructure, close to town centres and transport. Support the encouragement of development within areas supporting the town centres. Supports the vision to deliver 13,500 new high-quality homes of different sizes and types as this brings different opportunities to the forefront whilst also meeting the needs of Oldham's diverse community and to build improved neighbourhoods. The vision should	Noted.

Name	Organisation Details	Summary of Response	Council's Response
		reflect the need to encourage development in brownfield locations, whilst also considering greenfield land where required.	
	Russell LDP	<p>The vision establishes a desire to deliver a range of employment sites to provide opportunities for key sectors to grow and create an economic environment where businesses want to invest. Logistics and manufacturing industries play a vital role in the modern economy. Logistics has demonstrated strong resilience in previous economic down turns and recessions. Sets out reasons why Stakehill allocation will deliver economic benefits.</p> <p>Supports the vision for Oldham with regards to the provision of green infrastructure and sustainability as a clear priority within the construction of new developments.</p>	<p>Noted. The extension to Stakehill is proposed as part of Places for Everyone JPA2 which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. Places for Everyone is a separate Development Plan Document.</p>
Mr Peter Martin	P&D Northern Steels Ltd	<p>The term Boosting Northern Competitiveness should feature throughout the plan and particularly within the Vision and proposed objectives as it is a fundamental part of PfE. It should be made clear that it is not the intention of PfE to identify every single development site required to meet Oldham's needs. Site specific mention of a site in Woodhouses.</p>	Noted.
	The Casey Group	<p>Response makes reference to land interest at Broadbent Moss within PfE. Casey support the vision and ambition however suggest that greater emphasise be given to the importance of strategic housing allocations in achieving the 13,500 new high-quality homes by 2037.</p>	<p>Noted. The Broadbent Moss site is a strategic allocation (JPA14) proposed as part of Places for Everyone which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-</a></p>

Name	Organisation Details	Summary of Response	Council's Response
			<a href="#">housing/places-for-everyone/</a> for further information. Draft Local Plan Policy H1 Delivering a Diverse Housing Offer recognises the role of the PfE allocations in our approach to housing delivery and addressing our housing needs.
Joel Owen	First Choice Homes	Vision is bold and agree with the direction of aspirations. Would welcome details on how Oldham plans to meet carbon neutrality by 2030. Believe that there is an opportunity to utilise the full potential of the St Mary's District Heating System and request that this be included to support the vision of a sustainable Oldham. Plans to see 13,500 high quality new homes delivered by 2037 is also welcomed. It is important that we ensure that as many of the targeted 4,050 affordable homes (30%) are delivered.	Noted. Draft Local Plan includes more detail in the 'Addressing Climate Change' chapter on plans to meet carbon neutrality and the potential expansion of St Mary's Heat Network. The vision for Oldham and the plan period for the Draft Local Plan is now up to 2039 to reflect changes to Places for Everyone. Draft Local Plan Policy H7 sets out our approach to affordable housing.
Mr and Mrs Waite		Site specific comment made in relation to land to the south of Rochdale Road, Denshaw. Vision to achieve 13,500 high quality homes, it is important that that the more rural communities are not forgotten. This plan does not give any consideration to providing new housing in the more rural areas.	Noted. The Draft Local Plan includes Policy H9 on Rural Exception Sites which seeks to support the delivery limited affordable housing for up to 5 homes in rural parts of the borough to meet local housing needs.
	Northstone	Supports in principle and agrees with matters relating to green infrastructure, sustainability, jobs and the economy. However, it is inconsistent with the proposed scope of the Local Plan Review and the emerging PfE. The Vision suggests a pro-growth strategy which is not reflected in the housing and employment land supply or emerging allocations.	Noted. Upon adoption Places for Everyone will become part of the Local Plan for Oldham, alongside our adopted Core Strategy and then the new Local Plan when it's in place. Housing and employment needs will be met through strategic allocations proposed in Places and Everyone and the approach to delivery set out within the Draft Local Plan.

Name	Organisation Details	Summary of Response	Council's Response
Jean Betteridge	Oldham & Saddleworth Green Party	<p>Welcome that climate change has been given priority listing and also welcome the carbon neutral targets. The Local Plan needs to state explicitly that action on climate change has to be central to planning in all areas.</p> <p>Paragraph 12.3 should also include further examples: - protecting, increasing and enhancing our green open spaces and tree cover because of their vital role in combating climate change, - ensuring that economic development will not be at the expense of zero carbon targets.</p> <p>Paragraph 12.5. Economic development will be truly a Green New Deal, not just by attracting businesses that are part of a green and circular economy but also by reducing the impact of other business sectors on carbon emissions.</p>	<p>Noted. Tackling climate change is a central theme of the Draft Plan and it is considered that the policies set out provide a robust framework for ensuring that all development proposals mitigate the impact of climate change, make their contribution to meeting nationally binding targets to reduce greenhouse emissions and increase resilience. The Draft Local Plan includes more detail in the 'Addressing Climate Change' chapter on achieving carbon neutrality and the vision has been amended to say 'Oldham will be a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure network which brings multiple benefits to the natural and built environment as well as to the health of its residents and visitors'.</p>
Richard Clowes	TfGM	<p>Late Submission - The Transport paragraph could utilise Greater Manchester and Oldham's LTP Right Mix Vision. It should also reiterate Oldham's climate/carbon vision and the contribution that decarbonising the transport network will be required to make.</p>	<p>Noted. Reference to the Right Mix added to Plan Objective 10 and the 'Creating a Sustainable, Active, Accessible Network for Oldham' chapter. Reducing the need to travel, promoting active travel and encouraging sustainable modes of transport and supporting the expansion of electric vehicle charging capabilities are part of how the Draft Local Plan seeks to tackle climate change.</p>
	Natural England	<p>Late Submission - Vision should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. Support the commitment that Green Infrastructure will be protected and enhanced to</p>	<p>Noted. Vision amended to reference to the protection, restoration and enhancement of the natural environment. The Draft Local Plan includes policies on Protecting Nature (Policy N1) and Restoring Nature (Policy N2).</p>

Name	Organisation Details	Summary of Response	Council's Response
		create a net gain in Oldham's biodiversity, air quality and water quality. Could also include a strategic approach for the protection and enhancement of the natural environment, including considering opportunities to enhance and improve connectivity. Where relevant, this should link with the Biodiversity Action Plan and/or Local Nature Partnership.	
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Should explicitly mention the need to respond to the challenge of climate change. Thereafter it should be a golden thread running through the policies of the development plan.	Noted. Reference to responding to the challenge of climate change has been included in the Vision and is considered a central theme of the Draft Plan.



## Plan Objectives

Table PO1: Responses submitted on the Plan Objectives and the council's response

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support for PO4 Thriving Town Centres, PO7 Improving Air Quality and PO8 Preserving Heritage.	Noted.
Mrs Sharon Hibbert	Saddleworth Parish Council	PO5 needs to be broader and PO7 has reference to Health and Well-being, this needs to be reflected in the vision.	Noted. The Draft Local Plan vision has been amended to make reference to our residents having access to local community facilities and health and well-being provision and that they will have active and healthier lifestyles gained from access to active travel and green infrastructure. The Draft Local Plan includes plan objectives on protecting and enhancing Oldham's landscapes (PO5) and protecting, restoring and enhancing the natural environment (PO6), which have incorporated and strengthened the principles of what was PO5 in the Issues and Options.
	Historic England	In general support of plan objectives.	Noted.
Mr M Coulter	Grasscroft Properties Ltd	Support direction of PO1. The evidence behind any type of policy relating to the amount of development land required is expected to reflect the standard methodology. Accept that housing development should provide an appropriate mix of housing to address the housing needs but any policy should not be overly prescriptive and allow for applicants to take account of the most up-to-date evidence of housing need. Policies should	Noted. Places for Everyone (Policy JP-H1) sets out the boroughs housing requirement over the plan period 2022-2039. Further detail on our approach to housing delivery, mix and densities is set out in the Homes chapter of the Draft Local Plan.

Name	Organisation Details	Summary of Response	Council's Response
		allow for development of potential sites to be maximised, and high densities should be encouraged in sustainable locations.	
	Countryside Properties	Support direction of PO1. The evidence behind any type of policy relating to the amount of development land required is expected to reflect the standard methodology. Accept that housing development should provide an appropriate mix of housing to address the housing needs but any policy should not be overly prescriptive and allow for applicants to take account of the most up-to-date evidence of housing need. Policies should allow for development of potential sites to be maximised, and high densities should be encouraged in sustainable locations.	Noted. Places for Everyone (Policy JP-H1) sets out the boroughs housing requirement over the plan period 2022-2039. Further detail on our approach to housing delivery, mix and densities is set out in the Homes chapter of the Draft Local Plan.
Denise Luke		Support making efficient use of brownfield land as set out in PO1 as it is imperative to maintain Oldham's Green Infrastructure. Local Green Spaces will maintain the character of Oldham as 'the town in the country'. Improving life-chances and health and well-being in PO7 has to be fundamental to any plan. Improving and valuing a better environment, including the historic environment as set out in PO8 will aid a sense of a pride in the borough.	Noted. Improving health and well-being is considered a central theme of the Draft Plan.

Name	Organisation Details	Summary of Response	Council's Response
	Kellen Homes	Support direction of PO1 which reflects the importance of sufficient supply of housing and ensures housing needs are met. The evidence is expected to reflect standard methodology. Housing needs are diverse therefore any policy should not be overly prescriptive and allow for applicants to take account of the most up-to-date evidence of housing need/market information when preparing development schemes.	Noted. Places for Everyone (Policy JP-H1) sets out the boroughs housing requirement over the plan period 2022-2039. Further detail on our approach to housing delivery, mix and densities is set out in the Homes chapter of the Draft Local Plan.
	Russell LDP	Supports the plan objectives.	Noted.
Mr Peter Martin	P&D Northern Steels Ltd	PO1 should make it clear that part of the housing strategy for Oldham will be to meet local affordable needs to also target more affluent households to locate within the borough. To not do so would be inconsistent with PfE. Fundamentally flawed approach to say because a Green Belt review is being undertaken as part of PfE there will be no need to undertake one for the Local Plan. Site specific mention of a site in Woodhouses.	Noted. PO1 makes reference to delivering a diverse housing offer to address local housing needs, including affordable housing.
The Casey Group	The Casey Group	Support the draft plan objectives but suggest they emphasis the important role of the strategic allocations in delivering a level of housing required to meet need over the plan period. Suggest PO1 has a sub objective referring to the vital role of the allocations.	Noted. The strategic allocations are within Places for Everyone which is a separate Development Plan Document and upon adoption will form part our Local Plan. Policy H1 Delivering a Diverse Housing Offer recognises the role of the PfE allocations in our approach to housing delivery and addressing our housing needs.

Name	Organisation Details	Summary of Response	Council's Response
Joel Owen	First Choice Homes	<p>Encouraged that the proposals include for providing more homes to meet the growing housing need but should also address historic under-delivery.</p> <p>Support PO2 in recognition of the importance of creating training and employment opportunities. Agree with the importance of enhancement and protection of the green environment in PO5 but there should be a balanced approach when considering development opportunities adjacent to or on these green spaces by exception in favour for affordable homes, where access to this provision in these locations is low or non-existent.</p> <p>Supportive of PO6.</p>	<p>Noted. Places for Everyone (Policy JP-H1) sets out the boroughs housing requirement over the plan period 2022-2039. This is based on the Standard Methodology which takes account of previous under-delivery. Not considered appropriate to set this out within a Plan Objective. The Draft Local Plan includes Policy H9 on Rural Exception Sites which seeks to support the delivery of limited affordable housing for up to 5 homes in rural parts of the borough to meet local housing needs.</p>
Mr and Mrs Waite		<p>Site specific comment made in relation to land to the south of Rochdale Road, Denshaw. The objectives for housing need to take the needs for all settlements and not just larger settlements. The potential blanket protection to Green Belt does not allow opportunities for housing development to come forward in more rural areas, and this in turn will not support local facilities including sports and local schools. The opportunity for smaller scale housing allocations within areas restricted by Green Belt is completely overlooked within this process.</p>	<p>Noted. The Draft Local Plan includes Policy H9 on Rural Exception Sites which seeks to support the delivery of limited affordable housing for up to 5 homes in rural parts of the borough to meet local housing needs.</p>
	Northstone	<p>Support the objectives, in respect of housing, set pro-growth objectives to meet local needs. Importantly, they include reference to affordable housing provision, delivery of homes suitable for an ageing population and ensuring developments</p>	<p>Noted.</p>

Name	Organisation Details	Summary of Response	Council's Response
		are of high quality, sustainable and well-designed.	
Wayne Neal	Twingates Angling Club	Late Submission - Response set in the context of PfE and focussed on the Beal Valley Strategic Allocation. Background of the Angling Club provided. Support the plans stated objectives however concerned that the proposed development of Beal Valley directly contravenes several of the objectives, particularly PO3, PO4, PO5, PO6 and PO7.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. Upon adoption Places for Everyone will form part of Oldham's Local Plan.
Richard Clowes	TfGM	Late Submission - Transport cuts across a number of the objectives and whilst there is a specific objective (PO9) relating to connectivity other objectives could include references to transport including PO4, PO5, PO6, and PO7. PO9 - it could be added that higher density development could also be considered appropriate in and around town centres and not just at transport hubs.	Noted. PO9 has been replaced by PO10 in the Draft Local Plan which seeks to promote accessible and sustainable transport choices through, for example, supporting delivery of Oldham's Transport Strategy and the Right Mix approach and reducing the need to travel through ensuring new development is located in areas with access to local services and facilities
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Supportive of the wording in objectives PO5 and PO6 and suggests some amendments to PO6 in relation to SUDs and water efficiency standards.	Noted. PO6 has been replaced by PO7 in the Draft Local Plan which promotes sustainable development that mitigates and adapts to climate change, including the efficient use of water resources and water quality.

Name	Organisation Details	Summary of Response	Council's Response
Sylvia Whittingham	Environment Agency	<p>Late Submission - PO1 and PO5 could be amended to say that new residential schemes should be well designed and positively integrate, and where feasible enhance the local character and natural environment.</p> <p>Recommend an objective in regard to net gain specify the 10% net gain figure as outlined in forthcoming Environment Bill.</p> <p>In PO6 it is recommended that future development design also look to adopt policies that ensure sustainable use of water resources to protect vulnerable wetland habitats and species. It is recommended there is greater emphasis on reduction of water usage and that water efficiency be actively promoted and expected as part of new development in the borough.</p>	<p>Noted. PO5 has been amended to make reference to new developments making a positive contribution to Oldham's landscape and townscape features and characteristics. In the Draft Local Plan there is more detail on sustainable use of water resources and water efficiency in the 'Addressing Climate Change' chapter.</p>
	Natural England	<p>Late Submission - Welcome the objective to incorporate Green Infrastructure (GI) provision and the use of GI as key role to protect the environment, supporting biodiversity, habitats and nature conservation; and combating the effects of climate change. Consider a stand-alone objective for restoring, enhancing and protecting the natural environment that expands on the objectives mentioned in PO5, PO6 and PO7.</p>	<p>Noted. A plan objective (PO6) on protecting, restoring and enhancing the natural environment has been included in the Draft Local Plan.</p>

## Homes

Table H1: Responses submitted on the Homes Chapter and the council's response – General Comments

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support developing brownfield sites and a Mills Strategy as mentioned in paragraph 14.9.	Noted.
Paul Burns		Building new homes on Green Belt rather than brownfield is disappointing. Greenfield sites are attractive to developers, land owners and the council. The local wildlife and local residents suffer.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. The council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
June Richards		New homes should, where possible have room for parking for at least two cars to maintain highway safety. Covered bin storage should be essential.	Noted. Parking standards are set out within the 'Creating a Sustainable, Active, Accessible Network for Oldham' chapter of the Draft Local Plan and bin storage is set out within the 'Creating a Better and Beautiful Oldham' chapter.
Joanne Harding	Home Builders Federation (HBF) Ltd	The Plan sets out the proposed stepped housing requirement from the draft GMSF 2020. PfE (Aug 2021) sets out a different stepped requirement. It is assumed that the Oldham Local Plan will be updated to remain in line with the Joint DPD. The housing figure calculated by the Standard Method is the minimum housing need and there may be circumstances when it is appropriate to plan for a higher housing need figure than the standard method identifies. The council will need to ensure that they have explored each of these circumstances. The HBF has concerns around the	Noted. The Local Plan will be in conformity with Places for Everyone. Oldham's housing requirement is set out in Places for Everyone (PfE) and is that we are required to deliver 11,560 homes over the period of 2022-2039, equating to an average of 680 homes per year. The housing requirement is phased through a stepped housing requirement. The council is not proposing to allocate greenfield sites in the Green Belt for development within this plan. The Draft Local Plan includes Policy H9 on

Name	Organisation Details	Summary of Response	Council's Response
		<p>stepping of the housing requirement and the council should ensure that housing need is addressed as soon as is possible. Recommends that the council seeks to increase the numbers of homes to be provided for in the earlier steps and works with landowners and developers to assist in delivery of these homes.</p> <p>Supports the council in seeking to ensure that there is sufficient land available to meet the housing needs.</p> <p>Encourage the council to clearly set out the exceptional circumstances identified to support the need to release Green Belt, including the need to meet their local housing need.</p> <p>Support the need to ensure a range of housing land sites including larger sites to support a more diverse range of developers.</p>	<p>Rural Exception Sites which seeks to support the delivery of limited affordable housing for up to 5 homes in rural parts of the borough to meet local housing needs.</p>
Mrs Wendy Cooper	Save Shaw Greenbelt Group	<p>Should seek to provide more pensioner accommodation closer to local amenities, where older residents would have easier access to health care, public transport and community assets. The type of housing should be matched to the needs of the community they would serve, and none of the potential housing offer outlined in the Local Plan Review achieves this.</p>	<p>Noted. The Draft Local Plan includes Policy H4 on Homes for Older People.</p>
Submitted by Chorlton Planning on behalf of a number of clients. List of clients		<p>Comments made regarding PfE. Oldham Local Plan should identify and allocate smaller sites to ensure enough land at the right time. There will not be enough of these sites in the built-up area and greenfield sites (e.g. Green Belt / OPOL) will be needed. A Green Belt and OPOL review as part of the Local Plan is essential to allow smaller sites in sustainable locations to be considered for housing.</p>	<p>Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate</p>



Name	Organisation Details	Summary of Response	Council's Response
set out in Appendix 1.		<p>There is a need to review existing employment sites where housing could be accommodated.</p> <p>A range of housing needs to be planned for (examples listed), and a range of types of sites that are considered appropriate are listed included small sites, self-build / custom build, eco plots, village expansion schemes and bungalows.</p> <p>Rebalancing the housing markets to shift housing growth and provide executive housing as proposed in PfE has not been addressed in the Local Plan.</p> <p>The PfE and Local Plan greatly reduce choice to just need and not demands. The Local Plan directs housing to towns and urban areas which may meet housing requirements targets but does not address choice of location.</p>	<p>greenfield sites in the Green Belt for development within this plan. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.</p> <p>Noted. A review of OPOs and Employment Areas has been undertaken as part of the Local Plan Review.</p> <p>The policies within the Homes chapter of the Draft Local Plan address meeting our housing need including policies regarding self and custom build.</p>
Mr Peter Martin	P&D Northern Steels Ltd	<p>Comments submitted questioning the housing requirement in PfE.</p> <p>Outlines reasons why the five year housing land supply and the overall housing land supply position may be even worse than claimed and states the PfE allocations should not be relied on to meet need.</p> <p>There is a danger that an over-reliance on brownfield sites will not fully address the needs of those wishing to live in larger houses in lower density development. Site specific mention of a site in Woodhouses.</p>	<p>Noted. The Local Plan will be in conformity with Places for Everyone. Oldham's housing requirement is set out in Places for Everyone (PfE) and is that we are required to deliver 11,560 homes over the period of 2022-2039, equating to an average of 680 homes per year. The housing requirement is phased through a stepped housing requirement. Policy H1 Delivering a Diverse Housing Offer sets out our approach to housing delivery and addressing our housing needs.</p>
Mr Christopher Tansley		<p>The projections of 13,552 houses to be built in Oldham during the next 15 years appear a nonsense. If that many homes are built, it will have a disastrous effect on Oldham resulting in overcrowding and associated pressures, and loss of its character in addition to loss of irreplaceable</p>	<p>Noted. Oldham's housing requirement is set out in Places for Everyone (PfE) and is that we are required to deliver 11,560 homes over the period of 2022-2039, equating to an average of 680 homes per year. There is a policy in the 'Addressing Climate Change' chapter that outlines how</p>

Name	Organisation Details	Summary of Response	Council's Response
		Green Belt and Other Protected Open Land. Are new homes being fitted with low carbon heating devices: heat pumps/hydrogen boilers rather than gas boilers?	developments will be required to achieve high standards of sustainable design and construction in order to mitigate the effects of climate change and to realise the council's ambition of achieving carbon neutrality by 2030.
Jean Betteridge	Saddleworth Green Party	In the face of the climate emergency we need to avoid at all costs building on the Green Belt and other green spaces, such as former OPOL land. Outlines why there are problems with the national methodology and also sets out that it is not mandatory and local authorities can depart from it in exceptional circumstances. Believes the latest report of the Intergovernmental Panel on Climate Change (IPCC) more than justifies Oldham departing from the national methodology.	Noted. The Local Plan will be in conformity with Places for Everyone. Oldham's housing requirement is set out in Places for Everyone (PfE) and is that we are required to deliver 11,560 homes over the period of 2022-2039, equating to an average of 680 homes per year.
Jackie Copley	The Lancashire Branch of the Campaign to Protect Rural England	Late Submission - Local Plans are too easily found out of date by developers with an interest in building on land never intended for development. The Housing Delivery Test, checked against high housing requirements imposed by Government with the flawed standard method and mandated use of Office of National Statistic 2014 based (high) growth data, too soon finds local plans out of date.	Noted.
	Lichfields on behalf of a Consortium of housebuilders: Barratt Developments (Barratt Homes and David Wilson Homes),	Representations made about Greater Manchester strategic planning matters particularly strategic housing issues. Submitted a report entitled Greater Manchester Spatial Framework (GMSF) Issues and Recommendations which articulates the key concerns with previous GMSF and the emerging PfE and, by extension, the Oldham Local Plan. Note that the Oldham Issues and Options document and accompanying Housing Topic Paper do not provide clear confirmation of how the council	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. Draft Local Plan policies H1 Delivery a Diverse Housing Offer and H13 on Housing and Mixed-Use Allocations set out the council's approach to delivering our housing requirement, alongside Places for Everyone.

Name	Organisation Details	Summary of Response	Council's Response
	Bellway Homes, Bloor Homes, Story Homes, Redrow Homes and Taylor Wimpey.	intends to release other sites for housing, outside of the PfE Plan.	
Mr Peter Martin	P&D Northern Steels Ltd	Comments focus principally on the relationship between the emerging PfE and the Local Plan and the suitability. Availability and achievability of the Land West of Failsworth Road, Woodhouses to address future housing needs in Oldham. Comments submitted regarding the fact that the outcome of PfE is unknown.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.

Table H2: Responses submitted on the Homes Chapter and the council's response – Homes for an Ageing Population Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	Outlines that due to an ageing population Oldham should seek to provide more pensioner accommodation closer to local amenities, where older residents would have easier access to health care, public transport and community assets. Provides some sites where this may be possible and sets out the social function that retirement communities can provide. States that an ageing population does not require larger housing and as such the housing density would be higher enabling ultimately alleviating pressure on green space.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People.
Mrs Sharon Hibbert	Saddleworth Parish Council	All new homes to be built as lifetime homes is not a realistic target. The council should identify sites suitable for older people considering health needs and accessibility to services. And the council should work with specialist providers and advisors with consideration being given in light of the raising of the retirement age and accessibility to retirement accommodation.	Noted. The Draft Local Plan includes Policy H4 Homes for Older People and H5 Homes for Disabled People which seek to ensure that appropriate provision of housing is provided for older and disabled people. In addition, Places for Everyone Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations.
Kevin Hatherill		The council should be providing homes to meet the needs of Shaw and Royton's ageing population, including bungalows and sheltered accommodation in close proximity to local amenities. The housing types should be aligned to the needs of the ageing population, the potential housing types in the proposed Local Plan do not meet the needs of the ageing population.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People.

Name	Organisation Details	Summary of Response	Council's Response
Joanne Harding	Home Builders Federation Ltd	Supportive of providing homes that are suitable to meet the needs of older people and disabled people. The Lifetime Homes standard is no longer applicable and has been replaced by the optional Building Regulations accessibility standards (M4(2) and M4(3)). These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion. The council should work with developers and providers of older persons accommodation to determine the most appropriate approach, this may include providing allocations in suitable locations.	Noted. As set out within PfE policy JP-H3 all new homes must comply with the nationally described space standards and should be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations unless specific site conditions make this impracticable. These will be determined by the council on a case-by-case basis.
Mrs Jane Millet		Allocated sites may make residents feel safe, preventing loneliness, and providing natural socialising for residents.	Noted.
Mrs Wendy Cooper	Save Shaw Greenbelt Group	Royton and Shaw have a declining and ageing population. Should seek to provide more pensioner accommodation closer to local amenities. The type of housing should be matched to the needs of the community they would serve, and none of the potential housing offers outlined in the Local Plan Review achieve this. Not only do we need additional homes for the elderly we need affordable, accessible and social housing for everyone in this area not aspirational housing.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People. In addition, Places for Everyone Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations.

Name	Organisation Details	Summary of Response	Council's Response
Cllr Howard Sykes	Oldham Council	The OHIP Accessible Housing Project identified shortfalls in smaller units, larger houses, short term respite accommodation and bespoke accommodation and that there would be a disconnect between need and supply if actions were not taken. Locked Out (2012) also highlights problems with finding accessible accommodation in the private rented and for sale sectors. The Commission on Residential Care identified a number of housing models providing semi-independent or supported provision. Must recognise the needs of disabled or older people wishing to remain independent in private rented or owner-occupied accommodation and provide for a wider range of properties meeting their needs. The OHIP Accessible Housing Project Oldham Wheelchair Standard should be adopted in the Local Plan.	Noted. The Draft Local Plan includes Policy H4 Homes for Older People and H5 Homes for Disabled People which seek to ensure that appropriate provision of housing is provided for older and disabled people. In addition, Places for Everyone Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations.
Brian Beedham		The provision of housing for older people should be situated as near to the town centre as possible meaning people with mobility issues would be less disadvantaged when needing to access services and goods. The housing for older people must contain age related essential facilities.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People, which seeks to ensure that appropriate provision of housing is provided for older people.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. More evidence on homes for an ageing population needs to be prepared and consulted on. Viability is a key issue in Oldham so a greater understanding on the impact of Lifetime Homes on viability and delivery rates is needed. In addition, the location of Lifetime Homes needs to be appropriate.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see for further information. The Draft Local Plan includes Policy H4 on Homes for Older People, which seeks to ensure that appropriate provision of housing is provided for older people.

Name	Organisation Details	Summary of Response	Council's Response
Joel Owen	First Choice Homes	Recognise that the ageing population is a very real issue which requires a national and a local response. The council is best placed to determine the demand and need in older persons accommodation and therefore, should allocate specific parcels of land to support the delivery of new build older persons housing. To assist with viability and to maintain affordability, these sites should be subsidised. There is a unique option through the Town Centre Masterplan to deliver many of the proposed 2,500 homes as assisted living schemes or Extra Care Lite schemes, along with introducing intergenerational housing communities with a mix of younger persons starter homes mixed with older persons accommodation. The impact on viability however will need to be monitored	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People, which seeks to ensure that appropriate provision of housing is provided for older people.
Lisa Smirk	Save Shaw's Green Belt	Royton and Shaw have a declining and ageing population. We should seek to provide more pensioner accommodation closer to local amenities. The type of housing should be matched to the needs of the community they would serve, and none of the potential housing offers outlined in the Local Plan Review achieve this.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People, which seeks to ensure that appropriate provision of housing is provided for older people.
	Northstone	Providing a range of homes with the option of adaptation for an ageing population will help meet local needs. To promote a range of housing types, the housing land supply must present be in locations where an ageing population may wish to live.	Noted. The Draft Local Plan includes Policy H4 Homes for Older People which seeks to ensure that appropriate provision of housing is provided for older people. In addition, Places for Everyone Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations.
Darryl Nolan		Oldham needs more homes suitable for its aging population not more warehousing.	Noted. The Draft Local Plan includes Policy H4 on Homes for Older People, which seeks to ensure that

Name	Organisation Details	Summary of Response	Council's Response
			appropriate provision of housing is provided for older people.
Jean Betteridge	Oldham & Saddleworth Green Party	All new homes should be built as a Lifetime Home because they will provide not just for older people but younger people who through ill health and disability need adaptation to meet the changing needs.	Noted. The Draft Local Plan includes Policy H4 Homes for Older People and H5 Homes for Disabled People which seek to ensure that appropriate provision of housing is provided for older and disabled people. In addition, Places for Everyone Policy JP-H3 requires all new homes to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations.

Table H3: Responses submitted on the Homes Chapter and the council's response – Providing for a Diverse Housing Offer Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	None of the mix scenarios seem to be a good fit with potential needs. Local Authority waiting lists may be a better starting point for identifying need. The Greater Manchester Strategic Housing Market Assessment found that of 100,000 households over 70 percent of them required one or two bedrooms, while less than 10 percent required four bedrooms or more, therefore the ratio of one and two bedroom homes needs to be increased, which would not be delivered by the scenarios outlined. With regards setting out a portion of larger homes and homes for an ageing population as part of allocations, this approach could be used, but it	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. A partial update of the Local Housing Needs Assessment is currently underway. The update will reassess housing mix and identify particular housing needs and make policy recommendations on how the Local Plan can address housing needs through housing mix. This updated evidence may change the identified housing mix required within this policy, as appropriate.



Name	Organisation Details	Summary of Response	Council's Response
		would depend entirely on the location of the development.	
Mrs Sharon Hibbert	Saddleworth Parish Council	The overall vision is to set a mix of house types but flexibility needs to be built in to match all locations and community requirements need to be considered. With regards setting out a portion of larger homes and homes for an ageing population as part of allocations this should be a target rather than an absolute.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.
Mr J Jaskolka		In relation to questions regarding housing mix (1-7), the three scenarios identified though the LHNA project forward current characteristics and trends and each scenario results in similar outcomes. There is no attempt to identify or assess linkages between the type of housing to be delivered over future years and the borough's economic aspirations and the concept of mixed and sustainable communities. A boost in the supply of aspirational and larger family-sized housing is likely to form part of the solution in trying to retain and attract an economically active population. The document should seek to explore how the council intends to address a contracting working age population and	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met.

Name	Organisation Details	Summary of Response	Council's Response
		how the borough can attract and retain families and an economically active population. Statistics provided in relation to household types, changing demographics and migration to support comments made.	
Joanne Harding	Home Builders Federation Ltd	Supportive of providing a range and choice of homes to meet needs of the local area. Recommends a flexible approach in any policy regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market. The mix should not be limited by one form of evidence, as this can become quickly dated and other evidence and information may be more appropriate.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility. A partial update of the Local Housing Needs Assessment is currently underway. The update will reassess housing mix and identify particular housing needs and make policy recommendations on how the Local Plan can address housing needs through housing mix. This updated evidence may change the identified housing mix required within this policy, as appropriate.
Mrs Jane Millet		The Local Plan should not set out a specific mix of house type and size, instead allocations and development proposal should consider the local housing need of the surrounding area as appropriate.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.

Name	Organisation Details	Summary of Response	Council's Response
Mr M Coulter	Grasscroft Properties Ltd	Understand the need for a mix of house types, sizes and tenures and is supportive of providing a range and choice of homes to meet needs. However, a flexible policy approach needs to be adopted. Site specific constraints and opportunities vary from scheme to scheme and the mix of housing would need to be tailored to address this. It would not be reasonable to set out a particular proportion of larger housing. Mix should not be prescribed by only one form of evidence.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility. A partial update of the Local Housing Needs Assessment is currently underway. The update will reassess housing mix and identify particular housing needs and make policy recommendations on how the Local Plan can address housing needs through housing mix. This updated evidence may change the identified housing mix required within this policy, as appropriate.
	Countryside Properties	Understand the need for a mix of house types, sizes and tenures and is supportive of providing a range and choice of homes to meet needs. However, a flexible policy approach needs to be adopted. Site specific constraints and opportunities vary from scheme to scheme and the mix of housing would need to be tailored to address this. It would not be reasonable to set out a particular proportion of larger housing. Mix should not be prescribed by only one form of evidence.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility. A partial update of the Local Housing Needs Assessment is currently underway. The update will reassess housing mix and identify particular housing needs and make policy recommendations on how the Local Plan can address housing needs through housing mix. This updated evidence may change the identified housing mix required within this policy, as appropriate.
Denise Luke		Should be mixed housing on any development, will never be community cohesion without.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse

Name	Organisation Details	Summary of Response	Council's Response
			housing mix across the borough, ensuring that Oldham's identified housing needs can be met.
	Kellen Homes	The Local Plan should be flexible to allow for different house types and sizes to come forward in response to the market and the products offered by developers. Supports the view that there should be a mix of housing development scales from small to large scale.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Prescribing specific house types and sizes for allocations and development proposals may not be flexible enough to adapt to changes over time. We support adopting a flexible approach to mix, typology, and size which considers local housing need and market conditions and demand.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.
Joel Owen	First Choice Homes	It is clear that the highest demand is for larger family accommodation, however defining a one-size-fits-all mix to all development sites is too prescriptive and does not reflect the different, locally evidenced housing needs.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.

Name	Organisation Details	Summary of Response	Council's Response
Jean Betteridge	Oldham & Saddleworth Green Party	As well as a good mix of house sizes Oldham needs a mix of social and community tenure including more social housing, housing cooperatives, co housing, community land trusts, shared ownership.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. In addition, Policy H7 sets out the approach to affordable housing and Policy H11 sets out the approach to Custom / Self-Build and Community-led Housing.
	Northstone	It is not appropriate for the Local Plan to set a prescriptive mix of house types and sizes for all locations and development proposals. This approach is restrictive and can hinder sustainable development. It should promote a varied and mixed housing offer across all sites and work proactively with developers to bring forward schemes that are appropriate to their location, accessibility and surrounding character while having due regard to the changing housing needs of the borough. The Scenarios identified at Table 2 should be used by the council as a tool to guide developments and not a policy requirement.	Noted. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.
	Trendairo Ltd	Late Submission - Response set in the context of PfE and focussed on the Beal Valley Strategic Allocation. Representations on behalf of Trendairo Ltd, the owners of Duke Mill, Refuge Street in Shaw. The three scenarios identified through the Oldham LHNA (2019) project forward current characteristics and trends with no attempt to identify or assess linkages between the type of housing to be delivered over future years and the borough's economic aspirations and the concept of mixed and sustainable communities. This is a flaw in the way in which the options for housing mix are presented.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan contains Policy H2 on Housing Mix which seeks to ensure that new residential developments contribute to a diverse housing mix across the borough, ensuring that Oldham's identified housing needs can be met. The policy outlines circumstances in which an alternative mix may be appropriate, providing a degree of flexibility.

Name	Organisation Details	Summary of Response	Council's Response
		<p>Each of the scenarios would result in a substantial reduction in the working age population and a substantial increase in those aged over 60 years old. The council should explore further scenarios for housing mix through aligning the borough's housing and economic strategies and exploring what the implications would be for the borough of a contracting working age population.</p>	

Table H4: Responses submitted on the Homes Chapter and the council's response - Affordable Housing Questions

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support prioritising affordable housing.	Noted.
Mrs Sharon Hibbert	Saddleworth Parish Council	30% affordable housing as a baseline is supported and exceptions should be allowed but exceptional circumstances be required to go below 30%.	Noted. The Draft Local Plan contains Policy H7 on Affordable Housing. The policy sets out the exceptional circumstances where it may be appropriate to not provide the full amount of affordable housing required providing flexibility.
Mr J Jaskolka		In relation to questions 9-13 the council should explore the viability implications of an option that prioritises the redevelopment of brownfield sites in the urban areas of the borough, primarily within wards such as Coldhurst and St Marys. This should be seen alongside the need to address infrastructure requirements, biodiversity net gain and open space provision.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values.
Mrs Jane Millet		Each site should be given individual consideration depending on the area and size of building site.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. The policy also sets out the exceptional circumstances where it may be appropriate to not provide the full amount of affordable housing required providing flexibility.

Name	Organisation Details	Summary of Response	Council's Response
Mr M Coulter	Grasscroft Properties Ltd	Supportive of delivering affordable housing. The council will need to undertake assessments to understand the exact need across the borough as well as the viability implications of providing an affordable housing requirement borough wide or for specific zones dependent. In terms of affordable housing for major residential development within the borough, it is recommended that the policy direction takes into consideration paragraph NPPF which states planning policies and decision should expect at least 10% of the total number of homes to be available for affordable home ownership, providing flexibility and site-specific circumstances such as viability are taken into account.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. A partial update of the LHNA is currently underway, the findings from which will help to further inform Policy H7 and our approach affordable housing.
	Countryside Properties	Supportive of delivering affordable housing. The council will need to undertake assessments to understand the exact need across the borough as well as the viability implications of providing an affordable housing requirement borough wide or for specific zones dependent. In terms of affordable housing for major residential development within the borough, it is recommended that the policy direction takes into consideration paragraph NPPF which states planning policies and decision should expect at least 10% of the total number of homes to be available for affordable home ownership, providing flexibility and site-specific circumstances such as viability are taken into account.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. A partial update of the LHNA is currently underway, the findings from which will help to further inform Policy H7 and our approach affordable housing.
Kellen Homes		Any affordable housing policy should allow for flexibility and site-specific circumstances such as viability to be considered. It should be made clear	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable



Name	Organisation Details	Summary of Response	Council's Response
		that the wider definition of affordable housing, will be accepted. In terms of exceptions to affordable housing requirements, NPPF states that to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. Suggest confirming position on Vacant Building Credit within the emerging Plan.	housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. The policy also sets out the exceptional circumstances where it may be appropriate to not provide the full amount of affordable housing required providing flexibility. Policy H8 sets out the council's approach to vacant building credit.
Mr Peter Martin	P&D Northern Steels Ltd	Site specific mention of a site in Woodhouses stating it has significant opportunity to provide an element of affordable housing due to the viability of Woodhouses as a housing location.	Noted.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE and how Broadbent Moss will provide a range of house types and tenures including new market and affordable housing. Suggest that affordable housing provision be geographically dispersed across the borough on sites which meet a tested threshold, and not consolidated within certain areas. In terms of size and type, support adopting a flexible approach which considers local housing need to ensure that housing is fit for purpose and the end user.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values.
Mrs Natalie Blackston	First Choice Homes	A policy that advocates a blanket 50/50 split between social and/or affordable rented and intermediate would not align with our current approach which is based on evidenced need at ward level. We would favour an evidence-led approach, based on our data we would be happy to share with the council.	Noted. The Draft Local Plan contains Policy H7 on affordable housing and it states it will ensure that a diverse type and tenure of affordable housing is provided to accommodate all households in need. A partial update of Oldham's Local Housing Needs Assessment is currently underway, the findings from which will help to further inform Policy H7 and our approach affordable housing.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	The need for homes at social housing rents which offer security together with affordability is major and urgent. We need higher targets for homes at social housing rents. Once 25% of affordable housing S106 (developer contributions) for First Homes has been met the rest should be for rent at social housing levels.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values.
	Trendairo Ltd	Late Submission - The council should explore the viability implications of a strategic option that seeks to prioritise the redevelopment of brownfield sites in the urban areas of the borough. There needs be an understanding of the implications of such an approach in viability terms. This should be seen alongside the need to address infrastructure requirements such as appropriate education contributions, biodiversity net gain and open space provision.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. The policy also sets out the exceptional circumstances where it may be appropriate to not provide the full amount of affordable housing required providing flexibility.

Table H5: Responses submitted on the Homes Chapter and the council's response - Affordable Housing Spatial Option

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	Analysis of sales data found sales above Oldham's median sale price between October 2018 and September 2019 were skewed by the OL3 area, and to some extent the M35 area. On the other hand OL1, OL4 and OL8 areas skewed sales below Oldham's median sale price, suggesting they have depressed markets and affordable housing requirements may	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values.

Name	Organisation Details	Summary of Response	Council's Response
		further dis-incentivise development. Affordable housing provisions should be deployed judiciously across Oldham to re-balance the market.	
Mrs Sharon Hibbert	Saddleworth Parish Council	There needs to be a basic affordable housing target across the borough and a variable target according to specific needs.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values.
Joanne Harding	Home Builders Federation Ltd	Need further information on how need varies across the borough before consideration can be given to whether this would be appropriate. Viability implications to be fully considered. Without further evidence the HBF is not in a position to determine if a 30% affordable housing target may be appropriate. It may be that there are circumstances where exceptions to the affordable housing requirements are appropriate, again these could be in relation to the type, location and viability of development provided.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. A partial update of Oldham's Local Housing Needs Assessment is currently underway, the findings from which will help to further inform Policy H7 and our approach affordable housing.
Stuart Binks	Rowland Homes Ltd	Whatever option is taken forward it will need to be based on robust viability evidence.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. A whole-plan viability assessment will be carried out to inform the next stage of the Plan.
Denise Luke		Affordable housing threshold should be borough wide so that no one is excluded from living in the community where they have lived traditionally. Support 30% of new homes being affordable on larger developments.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development.

Name	Organisation Details	Summary of Response	Council's Response
Joel Owen	First Choice Homes	As the largest provider of affordable housing across Oldham, we support the recommendation of the LHNA that annual housing need numbers should be extrapolated forward to the Local Plan. Pleased to see a commitment to a 30% affordable housing target but are concerned that this target will be reduced through developer viability challenges. Larger sites present the opportunities for economies of scale and therefore, it is recommended that for sites over 100 units, this target be increased to 50%.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development.
	Northstone	The affordable housing requirement should be applied borough wide. The evidence presented suggests there is a mix of affordable housing needs spanning bedroom numbers and house types. A representable mix of affordable housing, including First Homes, across all locations of the borough will ensure the affordable housing types and sizes provided meet local needs across the borough. Increasing or decreasing the affordable housing requirement in certain settlements or locations may impact on the desirability of the location both for prospective developers and future residents. Agree that 30% affordable housing provision is appropriate borough-wide on all residential developments over 10 units subject to viability. There should be exceptions to the affordable housing requirements to ensure sites remain developable. Size and type of affordable housing should be left flexible and regard should be had to local housing needs at the point of early discussion with developers on individual proposals.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be delivered depends on the scale and location of the proposed development, having regard to viability and land values. The policy also sets out the exceptional circumstances where it may be appropriate to not provide the full amount of affordable housing required providing flexibility.
Jean Betteridge	Oldham & Saddleworth Green Party	Agree a requirement should be boroughwide and agree 30% as a minimum.	Noted. The Draft Local Plan contains Policy H7 which sets out the approach to providing for affordable housing. The amount of affordable housing to be

Name	Organisation Details	Summary of Response	Council's Response
			delivered depends on the scale and location of the proposed development.

Table H6: Responses submitted on the Homes Chapter and the council's response - Vacant Building Credit Questions

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Support having specific criteria and the criteria set out and a vacancy rate of 12 months is supported. It would be useful to clarify at what point does the criteria apply, particularly if the building is for sale rather than just vacant.	Noted. The Draft Local Plan has Policy H8 which sets out the council's approach to vacant building credit. The policy uses the Community Infrastructure Levy definition of a vacant building which defines a vacant building as 'a building that has not been in continuous use for any 6-month period during the last three years'.
	Historic England	Support the proposed mechanism through Vacant Building Credit to support the conversion of mills as set out in paragraph 14.46.	Noted.
Mrs Jane Millet		Do not think should have a specific policy in relation to VBC and if do the time-period it should have been vacant should be decided as and when. Each case should individual assessed.	Noted. The Draft Local Plan has Policy H8 which sets out the council's approach to vacant building credit. The policy uses the Community Infrastructure Levy definition of a vacant building which defines a vacant building as 'a building that has not been in continuous use for any 6-month period during the last three years'. It is considered that the time-period for vacant building needs to be set out within the policy to provide clarity and avoid ambiguity.
Denise Luke		The approach taken should be the one that is most likely to encourage re-use of vacant buildings whatever their condition	Noted. The Draft Local Plan has Policy H8 which sets out the council's approach to vacant building credit. It is felt that having a policy on Vacant Building Credit is

Name	Organisation Details	Summary of Response	Council's Response
			one of the ways to encourage re-use of vacant buildings.

Table H7: Responses submitted on the Homes Chapter and the council's response - Private Rented Sector Questions

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	The ambition should be to encourage developers to provide rental accommodation in specific areas. Applying it to all allocations and development proposals is an impractical requirement.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.
Mrs Jane Millet		A requirement for the level of private rented sector should be set.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.
Ms Deborah Wroe		By level do you mean quantity? If so no. If you mean quality, then yes.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.
	The Casey Group	Believe that investment in this sector should be driven by the market, rather than adopting an interventionist position through prescriptive policy.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.
Joel Owen	First Choice Homes	Do not believe it would be beneficial to identify allocations or land to support private rented sector housing, as the market will dictate the nature of this investment and delivery.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.
	Northstone	The level of private rented accommodation should not be set as a Policy requirement. Instead, local housing needs for this type of development should be included in evidence base documents and updated throughout the Plan period.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	As well as all the issues identified in para 14.50, the key issue for the private rented sector is lack of security. Licensing of landlords across the borough is needed, also more publicity and access to advice and information about tenants rights and the tenancy relations service.	Noted. On reflection it was not considered appropriate to have a policy in the Local Plan on the private rented sector.

Table H8: Responses submitted on the Homes Chapter and the council's response – Homes in Multiple Occupation Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	Yes, specific criteria and standards should be applied, such as the number of people in spaces and size of rooms and the number of people in shared living space.	Noted. Draft Local Plan Policy 10 sets out the approach to Houses in Multiple Occupation, setting out the circumstances in which they will be supported.

Table H9: Responses submitted on the Homes Chapter and the council's response – Homes in Multiple Occupation Spatial Option

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr Mike McCabe		Sets out a number of ways would like to see changes to the present application process to hold an HMO licence.	Noted. It is not within the remit of the Local Plan to be involved in the application process to obtain a HMO licence. Draft Local Plan Policy 10 sets out the approach to Houses in Multiple Occupation, setting out the circumstances in which proposals for such development will be supported in planning terms.

Name	Organisation Details	Summary of Response	Council's Response
Mr Sean Fielding		Request the introduction of an Article 4 direction is considered to remove permitted development rights for the conversion of properties in Oldham in to HMOs. Comments are in relation to Failsworth. The conversions have changed the nature of the neighbourhood and removed large family homes from the local housing mix, at a time when the demand for larger homes is considered so high that the release of areas of green belt land nearby to construct new, larger homes has been seriously considered by Oldham Council.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. In the meantime, Draft Plan Policy H10 sets out the council's approach to HMO's, including reference to the potential future implementation of an Article 4 Direction.
Lisa Jenkinson		Request the introduction of an Article 4 direction is considered to remove permitted development rights for the conversion of properties in Oldham in to HMOs. Comments are in relation to Failsworth. The conversions have changed the nature of the neighbourhood and removed large family homes from the local housing mix, at a time when the demand for larger homes is considered so high that the release of areas of green belt land nearby to construct new, larger homes has been seriously considered by Oldham Council.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. In the meantime, Draft Plan Policy H10 sets out the council's approach to HMO's, including reference to the potential future implementation of an Article 4 Direction.
Emma Bamlett		Request the introduction of an Article 4 direction is considered to remove permitted development rights for the conversion of properties in Oldham in to HMOs. Comments are in relation to Failsworth. The conversions have changed the nature of the neighbourhood and removed large family homes from the local housing mix, at a time when the demand for larger homes is considered so high that the release of areas of green belt land nearby to construct new, larger homes has been seriously considered by Oldham Council.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. In the meantime, Draft Plan Policy H10 sets out the council's approach to HMO's, including reference to the potential future implementation of an Article 4 Direction.



Name	Organisation Details	Summary of Response	Council's Response
Ray Folkard		Request the introduction of an Article 4 direction is considered to remove permitted development rights for the conversion of properties in Oldham in to HMOs. Comments are in relation to Failsworth. The conversions have changed the nature of the neighbourhood and removed large family homes from the local housing mix, at a time when the demand for larger homes is considered so high that the release of areas of green belt land nearby to construct new, larger homes has been seriously considered by Oldham Council.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. In the meantime, Draft Plan Policy H10 sets out the council's approach to HMO's, including reference to the potential future implementation of an Article 4 Direction.
Mrs Sharon Hibbert	Saddleworth Parish Council	Support the removal of permitted development rights if there is found to be an over concentration of HMOs in specific areas as necessary.	Noted. The Draft Local Plan includes has Policy H10 on HMOs and states that HMOs will only be supported where there is not an undue concentration of HMO provision in the area. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. Reference to the potential future implementation of an Article 4 Direction is contained within Policy H10.
Mrs Jane Millet		Support the removal of permitted development rights if there is found to be an over concentration of HMOs borough-wide.	Noted. The Draft Local Plan includes Policy H10 on HMOs and states that HMOs will only be supported where there is not an undue concentration of HMPO provision in the area. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. Reference to the potential future implementation of an Article 4 Direction is contained within Policy H10.

Name	Organisation Details	Summary of Response	Council's Response
Cllr Howard Sykes	Oldham Council	Urge the council to establish a borough-wide Article 4 direction as part of the revised Local Plan. Applicants seeking a HMO should be required to prepare a Statement of Community Engagement and compile a risk assessment statement. As a planning condition, applicants should be required to establish a consultation group with local residents and groups; and recommended to discuss ongoing management after completion. There is a need for the provision of semi-supported accommodation. Would like to see the creation of more community-led or funded transition accommodation.	Noted. The Draft Local Plan includes Policy H10 on HMOs and states that a Statement of Community Engagement and Impact Assessment is required as part of any planning application for a HMO. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. Reference to the potential future implementation of an Article 4 Direction is contained within Policy H10.
Jean Betteridge	Oldham & Saddleworth Green Party	We need to discourage them as they are not fit homes, they are a poverty trap. It is people on low incomes who, through no choice, are trapped in this type of housing and living situation. There is a desperate need in Oldham for genuinely affordable housing for single people but rather than welcoming HMOs as a solution, we need to recognise that it shouldn't be solved by putting people in unsuitable accommodation. There should be a borough wide Article 4 to increase local control of these developments. We agree that new HMOs should meet appropriate standards.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. Reference to the potential future implementation of an Article 4 Direction is contained within Policy H10. Policy H10 on HMOs sets out that HMOs must comply with the relevant design and amenity standards as outlined in policy D1, and any future HMO standards developed by the council.
Sue Heppell		Comments regarding the number of HMOs in Failsworth. States that they are not good for the community or in keeping with the area and create a rise in crime, issues with parking and noise nuisance. Would like to see the introduction of Article 4 Directions on houses planning to become HMOs.	Noted. At present there is insufficient evidence to support an Article 4 Direction to remove permitted development rights for HMOs. The council is monitoring HMO development across the borough. Dependent on future evidence, this position may be updated at Publication Plan stage. Reference to the potential future implementation of an Article 4 Direction is contained within Policy H10.

Table H10: Responses submitted on the Homes Chapter and the council's response – Providing for Self-build and Custom Housebuilding Questions

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Specific allocations should be identified for but not all residential developments should have to provide plots. The council could have a target to encourage self-build. There should be a time limit for the sale and delivery of these plots to ensure appropriate delivery.	Noted. The Draft Local Plan includes Policy H11 on Custom / Self Build and Community-led Housing. The policy sets out how a supply of sites will be secured and sets a time limit for delivery.
Joanne Harding	Home Builders Federation Ltd	The provision of a certain percentage self-build plots on schemes above a certain size adds to the complexity and logistics of development and may lead to the slower delivery of homes. The timescale for reversion of these plots to the original developer should be as short as possible because consequential delay presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. Any impacts on viability should be tested and additional costs should be fully accounted for in the council's viability assessment. The inclusion of self-build plots will have a fundamental bearing on the development economics of the scheme.	Noted. The Draft Local Plan includes Policy H11 on Custom / Self Build and Community-led Housing. The policy sets out how a supply of sites will be secured and sets a time limit for delivery. It also sets out that exemptions from other policy contributions may apply to support delivery where necessary and will be decided on as a case-by-case basis.
Mrs Jane Millet		Not all residential developments should have to provide self-build and custom build plots, they should only be in certain areas of demand. There should be a time limit for the sale and delivery of these plots to ensure appropriate delivery.	Noted. The Draft Local Plan includes Policy H11 on Custom / Self Build and Community-led Housing. The policy sets out how a supply of sites will be secured and sets a time limit for delivery.

Name	Organisation Details	Summary of Response	Council's Response
Cllr Howard Sykes	Oldham Council	Supports the aspiration of communities and individuals to build their own homes. Keen to support the provision of co-operative and not-for-profit housing schemes built collectively and occupied by those building the properties.	Noted. The Draft Local Plan includes Policy H11 on Custom / Self Build and Community-led Housing.
Joel Owen	First Choice Homes	The council is required to maintain a custom and self-build register and as such it would be logical to cross reference the list with the sites identified in the draft local plan allocation and where practicable ensure there is an opportunity for self-serviced and custom plots to be identified and ringfenced. It is recommended that where plots are undeveloped after a 3-year period they be converted to Social Housing and disposed to an RP. Sites of scale (over 100 homes) present the greatest opportunity. In these instances the council could request a minimum requirement e.g. 1-5% is set out in the section 106 agreements in addition to the affordable housing requirements, with the Registered Social Housing providers supporting the community self-build element.	Noted. The Draft Local Plan includes Policy H11 on Custom / Self Build and Community-led Housing. The policy sets out how a supply of sites will be secured and sets a time limit for delivery.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Recommend that the council gives careful consideration to the delivery of infrastructure on such sites. Where sites are specifically identified for self-building, consideration needs to be given to a co-ordinated approach to infrastructure provision.	Noted.

Table H11: Responses submitted on the Homes Chapter and the council's response – Community Right to Build Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Jane Millet		Community Right to Build sites should not be identified on green land that is used by public, nature sites and flood land.	Noted.

Table 12: Responses submitted on the Homes Chapter and the council's response – Providing for Children's Homes Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	There should be a policy on the use of properties as children's homes and also the placement of children outside of the borough needs to be identified.	Noted. The Draft Local Plan includes Policy H6 on Homes for Children and Care Leavers.
Jean Betteridge	Oldham & Saddleworth Green Party	There should be a specific policy on the use of properties as children's homes.	Noted. The Draft Local Plan includes Policy H6 on Homes for Children and Care Leavers.

Table 13: Responses submitted on the Homes Chapter and the council's response – Density Question's

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	Recognise the need for minimum densities in principle, but seek more clarity. The specification prescribes a density of 120 for town centres, which Oldham Town Centre could support, but a smaller one like Royton may struggle with that level of capacity. On the other	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing. This reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to particular locations

Name	Organisation Details	Summary of Response	Council's Response
		hand Royton town centre may be able to accommodate a density of 70 prescribed for 'Other designated centres', but further clarity is sought as to where these densities will apply. Likewise, the table also prescribes a density of 120 within 400m of a Metrolink stop in a large-designated centre; again, Oldham Town Centre may be able to sustain this order of density but for the purposes of the table does Shaw qualify as 'large designated centre'? More detail is required.	across Oldham as well as the circumstances in which lower densities may be acceptable.
Mr J Jaskolka		Identifying and facilitating high-density developments within urban areas is part of the solution to addressing unmet and future housing needs. However, the council's approach will perpetuate flaws in the housing market if it is singularly reliant upon such an approach. High density will not be appropriate in all areas of the borough. Viable, greenfield and edge-of-settlement sites form part of a sustainable solution to meeting the borough's needs and it will not always be appropriate to apply a blanket approach to housing densities.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing. This reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to locations across Oldham as well as the circumstances in which lower densities may be acceptable.
	Historic England	Consider that residential density should be based on local character, being defined by the location and what the surrounding natural, built and historic environment is like. Do not object to setting minimum densities, recognising the role this can have in making an efficient use of land. The setting of densities may be more appropriate at a local level through guidance. Where development would have an impact on landscape setting or the historic environment, lower densities may be required to avoid harm to the character of the borough particularly in rural locations or areas on the urban fringe. A suitable evidence base will help identify where these locations may be.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing. This reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to locations across Oldham. It also sets out the circumstances in which lower densities may be acceptable, including the potential impact on landscape, townscape, designated and non-designated heritage assets and green infrastructure.

Name	Organisation Details	Summary of Response	Council's Response
		Conversely, mill villages may have historically been built at relatively high densities where housing was located close to the mill and in such circumstances this may lend to new development being constructed at a high density to maintain character of these historic villages.	
Joanne Harding	Home Builders Federation Ltd	Supports the use of a density policy. It is important to ensure that the prioritisation of higher density development and the use of PDL does not compromise the delivery of homes in sustainable locations to meet local needs. Should ensure there is flexibility within the policy to ensure that development is viable, sustainable and appropriate and that the local character is not lost due to the emphasis on higher densities. It would be beneficial to consider the reality of the density requirements alongside the impacts of all of the council's policy requirements and emerging Government policies.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing and sets out circumstances where lower densities may be acceptable.
Mrs Sharon Hibbert	Saddleworth Parish Council	Density lower than the minimum assumptions set out above would be acceptable in housing and mixed use allocations.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing and sets out circumstances where lower densities may be acceptable.
Mrs Jane Millet		These minimum density assumptions are not be appropriate on green areas these should be kept protected.	Noted.
Stuart Binks	Rowland Homes Ltd	This range appears to be appropriate as it does not prevent the opportunity to develop suitable sites at lower densities.	Noted.
Sarah Welsh	Peak District National Park Authority	Any sites that are adjacent to or visible from the national park may require different density requirements to ensure they assimilate sensitively into the landscape.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing and sets out circumstances where lower densities may be acceptable. Furthermore, Draft Local Plan Policy OL1 on the Consideration for the Peak District National Park states that development that is viewed as conflicting

Name	Organisation Details	Summary of Response	Council's Response
			with the purposes of the national park will not be permitted.
Mr Peter Martin	P&D Northern Steels Ltd	The range appears to be appropriate particularly as it does not prevent the opportunity to develop suitable sites at lower densities, that can meet certain needs, for example, larger family homes. However, it should also be recognised that certain urban sites may not achieve the suggested densities and therefore final assumptions relating to overall urban supply within the SHLAA should be sensitivity checked and afforded some degree of caution.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing and sets out circumstances where lower densities may be acceptable.
	The Casey Group	Will work with the council and other landowners to ensure an appropriate density on Broadbent Moss. Support the density assumptions in Table 3.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
	Northstone	There is a need for a degree of flexibility to the density standards and it would be appropriate for the flexibility to be included as part of the Local Plan. Flexibility to the PfE minimum density standards could be achieved by allowing for exceptions to the rule. Suitable exceptions could include local character, setting and housing need and be considered on a site by site basis.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing and sets out circumstances where lower densities may be acceptable including local housing market issues and site-specific issues including impacts on townscape and landscape.
Jackie Copley	The Lancashire Branch of the Campaign to Protect Rural England	Late Submission - CPRE advocate higher density development in locations that can accommodate it and want adequate developer contributions to be agreed to make development sustainable in the long term.	Noted.



<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Richard Clowes	TfGM	Late Submission - If considering densities that are not aligned with PfE development density principles this could affect GM's housing supply and undermine PfE? TfGM strongly recommend that a lower density standard is not pursued given the challenging travel and carbon implications of low-density housing.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing. This reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to locations across Oldham as well as the circumstances in which lower densities may be acceptable.

Table 14: Responses submitted on the Homes Chapter – Housing and Mixed-Use Allocation's Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr J Jaskolka		Outlines a number of reasons as to why site at Alderney Farm is a logical and deliverable site for housing development. Also submitted as an appendix a previous site-specific representation to GMSF 2019 providing more detail on this.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Historic England	Historic England	The development of a number of sites within the UDP may have an impact on heritage assets.	Noted.
Stuart Binks	Rowland Homes Ltd	Representation in relation to Ferney Field Farm: Site has potential for 100 family homes (35 dph). Consider that the site should be considered in the SHLAA and Local Plan Review and sets out reasons as to why. Saved UDP allocations equate to 679 homes. Have doubt over their deliverability as they have been allocated for 15 years. Ferney Field Farm is deliverable.	Noted. Ferney Field Road is currently designated as area of Other Protected Open Land in the Core Strategy. Going forward it is proposed for designation as a Local Green Space (LGS2) in Draft Local Plan Policy OL4.
Mrs Jane Millet		Any open area that is home to wildlife, that has wooded areas, natural flood land area and is open for public use should not be considered for building areas.	Noted

Name	Organisation Details	Summary of Response	Council's Response
Mr E. F. Connell	The Connell Group	Site suggestion - Mossdown Road, Royton	Noted. Land at Mossdown Road, Royton falls within Places for Everyone JPA14 Broadbent Moss. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mrs Corbett		Site suggestion - Land at Denshaw Vale, Denshaw	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr D Winterbottom		Site suggestion - Paulden Farm, Waterhead	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr Peter Martin	P&D Northern Steels Ltd	Saved UDP allocations equate to 679 homes. Have doubt over their deliverability as they have been allocated for 15 years. Specific comments about the two allocations in Woodhouses have been made. Comments made regarding the sites in Woodhouses included within PfE, Bottom Field Farm. A number of supplementary documents were submitted as evidence the site at Woodhouses is available and deliverable.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Quantum Star Ltd	Quantum Star	Site suggestion - Rumbles Lane, Denshaw	An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability for redesignation as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . As a result Policy OL4 Local Green Space proposes to de-designate Land at Rumbles Lane, Delph as Other Protected Open Land.

Name	Organisation Details	Summary of Response	Council's Response
Mr S Ingram	Design Studio	Site suggestion - Corbett Way, Denshaw	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mrs A Lord		Site suggestion - Long Lane / Sandy Lane, Dobcross	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
	Dronsfields Limited	Site suggestion - Pennine Works, Royton	Noted. Falls within Higginshaw Business Employment Area, which is designated through Draft Local Plan Policy E1.
Mrs P Lutener		Site suggestion - Crib Lane / Long Lane, Dobcross	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr M Megson (Trustee)		Site suggestion - 104 Oldham Road, Grasscroft	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr B.H. Tomlinson		Site suggestion - Stoneswood Farm, Oldham Road, Delph	Noted. Stoneswood Farm, Oldham Road is currently designated as area of Other Protected Open Land in the Core Strategy. Going forward it is proposed for designation as a Local Green Space (LGS14) in Draft Local Plan Policy OL4.
Mr J Downs		Site suggestion - Higher Shaws / Redwood Road, Uppermill	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr D Hind		Site suggestion - Land at Poplar Avenue	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.

Name	Organisation Details	Summary of Response	Council's Response
John Tanner	Tanner Brothers	Site suggestion - Waterside Mill, Greenfield	Noted. Waterside Mill, Greenfield is currently designated as a Saddleworth Employment Area. It is proposed to carry this forward in the Draft Local Plan in which it has been renamed Business Employment Area 19 (BEA19).
A Hegab		Site suggestion - Ripponden Road, Denshaw	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
W Clarke		Site suggestion - Failsworth Road, Woodhouses	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Anwyl Homes		Site suggestion - Bottom Field Farm Woodhouses	Noted. Part of land at Bottom Field Farm, Woodhouses, falls within Places for Everyone JPA13 Bottom Field Farm. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
D Vick		Site suggestion - Land at Spinners Way & Alderney Farm	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Connell Family		Site suggestion - Hanging Chadder, Royton	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Ms K Harvey		Site suggestion - Ward Lane, Diggle	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the

Name	Organisation Details	Summary of Response	Council's Response
			council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Z. Iqbal		Site suggestion - Oldham Road, Waterhead	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Mr and Mrs Waite		Outlines a number of reasons as to why site south of Rochdale Road, Denshaw is a deliverable site for housing development.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
P Haworth		Site suggestion - Broadbent Farm, Oldham	Noted. Land at Broadbent Farm, Oldham falls within Places for Everyone JPA14 Broadbent Moss. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
K McAvoy		Site suggestion - Rear of Waterfield Way, Failsworth	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
K Henthorn		Site suggestion - Ripponden Road	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.
Ervan Connell		Site suggestion - Acres Farm, Chadderton	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan.

Name	Organisation Details	Summary of Response	Council's Response
	Northstone	There is no suggestion that the Local Plan will review local housing needs and include a spatial strategy element to the emerging plan. It is therefore unclear what the purpose of this question is. If the plan is to appraise and potentially allocate sites as residential development this is supported. Raise concerns over the Saved UDP allocations as there appears to be no developer interest to bring them forward. Submission then outlines the reasons why Hanging Chadder is a suitable housing site. Submission includes the Hanging Chadder Development Framework and the representation submitted to the GMSF 2019 consultation.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
	Trendairo Ltd	Late Submission - Duke Mill should be considered suitable, available and achievable for housing.	Noted. Duke Mill is identified within the council's Strategic Housing Land Availability Assessment as a potential residential development opportunity and falls within Places for Everyone JPA12 Beal Valley. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Surplus land south of Royton Wastewater Treatment Works - welcome the opportunity to discuss the future development potential of land that is surplus to operational requirements. In addition, the position of UU is that it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, not close to a wastewater treatment works. Recommended policy wording suggested.	Note. Royton Wastewater Treatment Works has been identified as a potential housing allocation in the Draft Local Plan (see Policy H13 Housing Allocations and Mixed-Use Development).

## Economy and Employment

Table EE1: Responses submitted on the Economy and Employment Chapter and the council's response – General Comments

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support preventing the extension of Stakehill Estate into Chadderton's Green Belt.	Noted. Land to the south of Stakehill falls within Places for Everyone JPA2 Stakehill, a cross-boundary allocation between Oldham and Rochdale. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mr J Jaskolka		In relation to questions 1-9: The borough's economic aspirations will be seriously undermined if a policy response is not formulated to address a working age population that will contract by the year 2037. The response is likely to involve the release of edge-of-settlement sites for high-quality and family-sized housing that will serve to attract and retain an economically active population.	Noted. The Draft Local Plan vision is that Oldham will have quality homes for everyone that meet the needs of Oldham's diverse communities, including families, and that the borough will be a key contributor to Greater Manchester's economy, with a strong reputation for clean growth and green innovation. It will be a place of dynamic businesses with better job opportunities, where every resident will be enabled to contribute to, and benefit from, economic growth of the city region.

Name	Organisation Details	Summary of Response	Council's Response
Mrs Wendy Cooper	Save Shaw Greenbelt Group	Oldham is seen as part of the Northern Gateway Project. This may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway.	Noted. JPA1 Northern Gateway and JPA2 Stakehill are allocations within the Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan vision includes that Oldham will be a key contributor to Greater Manchester's economy and PO3 seeks the northern competitiveness of the borough through, amongst others, encouraging and facilitating the development of the borough's key economic sectors.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Makes reference to supporting PfE allocations. Mills should be considered on an individual basis as to whether they are used for employment. Saddleworth Employment Areas tend to serve local needs and demands and some are underused and would benefit from partial or whole re-development. Some sites may be suited to non-employment uses, such as housing, but a smaller amount of employment could be retained in a mixed development layout.	Noted. The Draft Local Plan includes Policy HE4 Oldham's Mills and Policy E3 Reuse and Redevelopment of Mill Buildings. The Business and Employment Areas and Saddleworth Employment Areas have all been assessed as part of the Draft Local Plan and those proposed for designation are identified in Policy E1 Business and Employment Areas.



Name	Organisation Details	Summary of Response	Council's Response
	SHF Property Investments	Representation relates to Ram Mill within BEA 3 and sets out reasons why the site is no longer fit for employment purposes and would benefit from being re-purposed to secure the future survival and long-term viability of the building. Acknowledges that there is pressure on existing employment sites to be released for other uses, and there needs to be a reconfiguration of the employment stock to determine that land and sites are being put to the most appropriate use. Support this flexible approach to employment sites and the acknowledgment that some sites are no longer fit for purpose and it would be more beneficial to be put an alternative use.	Noted. The Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) have all been assessed as part of the Draft Local Plan – these are set out in Policy E1. It is proposed that Ram Mill remains within BEA 3 however the Draft Local Plan includes policies on the reuse and redevelopment of mill buildings (Policy E3) and sets out circumstance when exceptions to the uses listed within the BEAs may be permitted (Policy E2).
Tracy Woodward	Save Chadderton's Greenbelt Committee.	Specific comments regarding the Places for Everyone (PfE) allocation at Stakehill. Of the key growth sectors identified, it is likely only manufacturing sub-sectors (i.e. warehousing), and logistics would be suitable, of which there is already a surplus in Oldham, and particularly Chadderton. Further industry is not required in the area, and no evidence has been provided for the need for low-aspirational and low-wage industry in the area. Chadderton is bearing the brunt of industrialisation which will have long term impacts on the environment and the local population. There is a lack of specification in regard to the creation of likely job numbers which the council expect to be created, making it difficult for the public to make an informed judgement as to whether the sacrifice of the Green Belt would be a price worth paying.	Noted. JPA2 Stakehill is an allocation within Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.

Name	Organisation Details	Summary of Response	Council's Response
Brian Beedham		The impact of on-line shopping must be considered and how it may have an adverse effect on the local economy. If shopping habits change we could end up with an oversupply of logistics warehousing. Local shops need support or high streets will come a thing of the past. If in the future there is an oversupply of shops they should be converted to housing	Noted.
Mrs Tracy Woodward		There is no evidence for industrial units on Stakehill with vacancies in the existing Stakehill and Kingsway. The council has failed to assess demand and future projections for demand, which discredits any plan to utilize greenbelt under the guise of 'exceptional circumstances'. Is there any evidence that jobs created by the industrialization of Stakehill would be anything other than low paid warehousing jobs.	Noted. JPA2 Stakehill is an allocation within Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Jean Betteridge	Oldham & Saddleworth Green Party	To deliver on tackling climate change as a priority Oldham's Green New Deal must be at the heart of the development of the economy and employment. Requiring a reduction in carbon emissions of the operations should be part of any scheme seeking planning permission.	Noted. Draft Local Plan Objective PO3 seeks to boost northern competitiveness through, amongst others, encouraging and facilitating the development of the borough's key economic sectors with a focus on clean growth and green innovation. Furthermore, the Draft Local Plan includes more detail in the 'Addressing Climate Change' chapter on plans to meet carbon neutrality.
Lisa Smirk	Save Shaw's Green Belt	Oldham is seen as part of the Northern Gateway Project. This may have unforeseen consequences leading to an over-supply of warehousing; a scenario may be envisaged where Oldham, Bury and Rochdale are competing for the same business, reducing the competitive effectiveness of the Northern Gateway.	Noted. JPA1 Northern Gateway and JPA2 Stakehill are allocations within the Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan vision includes that Oldham will be a key contributor to

Name	Organisation Details	Summary of Response	Council's Response
			Greater Manchester's economy and PO3 seeks the northern competitiveness of the borough through, amongst others, encouraging and facilitating the development of the borough's key economic sectors.
Greg Hull		There is no evidence for industrial units on Stakehill with vacancies in the existing Stakehill and Kingsway. The council has failed to assess demand and future projections for demand, which discredits any plan to utilize greenbelt under the guise of 'exceptional circumstances'. Is there any evidence that jobs created by the industrialization of Stakehill would be anything other than low paid warehousing jobs.	Noted. JPA2 Stakehill is an allocation within Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Jeanette Hull		Comments submitted in relation to the Stakehill allocation proposed in PfE and how it is inappropriate development.	Noted. JPA2 Stakehill is an allocation within Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Darryl Nolan		Oldham needs to make its own decisions based on its own needs and not duplicate the economic needs of other boroughs there is already too much land being allocated for warehousing in other boroughs.	Noted.

Table EE2: Responses submitted on the Economy and Employment Chapter and council’s response – Approach to Employment Areas Questions

Name	Organisation Details	Summary of Response	Council’s Response
Noel Mahon	Save Royton's Green Belt Community Group	Oldham is seen as part of the Northern Gateway Project. This may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway.	Noted. JPA1 Northern Gateway and JPA2 Stakehill are allocations within the Places for Everyone, which is being prepared through a separate process to the review of Oldham’s Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan vision includes that Oldham will be a key contributor to Greater Manchester’s economy and PO3 seeks the northern competitiveness of the borough through, amongst others, encouraging and facilitating the development of the borough’s key economic sectors.
Kevin Hatherill		Must avoid further development of green spaces for the expansion of industrial and warehouse facilities, as this spoils the local area (reducing wellbeing) and risks merging Shaw and Rochdale. Concerned about the loss of Green Belt. Jobs should be created in town centres where there are transport links. Creating homes in town centres and on brownfield sites will reduce commuting and serve businesses in close proximity.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions and the council is not proposing to allocate greenfield sites in the Green Belt for development within this plan. Policy C4 on the change of use and redevelopment within the borough’s centres sets out that the provision of homes will generally be supported in our centres.

Name	Organisation Details	Summary of Response	Council's Response
	Historic England	Several employment areas contain historic mills. It would be beneficial to carry out Heritage Impact Assessments for those sites where new development may have an impact on the significance of a heritage asset.	Noted. The Draft Local Plan has Policy HE2 on securing the preservation and enhancement of Oldham's Heritage Assets which outlines that proposals that affect heritage assets will require the submission of a Heritage Statement.
Mrs Sharon Hibbert	Saddleworth Parish Council	Two of the employment areas listed are no longer available. There is a need to identify other potential business sites for future development. Support a tiered approach, the restriction of uses within the employment areas, the exceptions and agree that the Saddleworth Employment Areas should have different policy. Do not agree with having no protection over our employment areas.	The Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) have all been assessed and boundaries proposed to be revised where appropriate as part of the Draft Local Plan. The Draft Local Plan has policies regarding the uses permitted within our BEAs (Policy E1) and the circumstances where exceptions may be permitted (Policy E2).
Mrs Jane Millet		Agree with having no protection over the employment sites long as this does involve our green areas.	Noted. The Draft Local Plan has policies regarding the uses permitted within our BEAs (Policy E1) and the circumstances where exceptions may be permitted (Policy E2).
Denise Luke		Support anything that will guarantee economic growth of the town.	Noted.
SHF Property Investments		Representation relates to Ram Mill within BEA 3 and sets out reasons why the site is no longer fit for employment purposes and would benefit from being re-purposed to secure the future survival and long-term viability of the building. Support for a flexible policy approach to BEAs and SEAs, and that where sites are under-used and no longer fit for purpose, alternative non-business uses, such as residential, should be allowed subject to compliance with other detailed design and amenity policies.	The Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) have all been assessed as part of the Draft Local Plan. It is proposed that Ram Mill remains within BEA 3. Policy E3 sets out the council's approach to the reuse and redevelopment of mill buildings whilst the circumstance when exceptions to the uses listed within the BEAs may be permitted is contained in Policy E2.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	Welcome a proactive approach to attracting firms developing green technologies and support the designation of areas to that sector. Development in Saddleworth needs to be handled carefully, there is a need for jobs other than leisure and tourism that are often low paid and seasonal. The use of employment areas should be decided in the best interests of the community not by the market.	Noted. Draft Local Plan Objective PO3 seeks to boost northern competitiveness through, amongst others, encouraging and facilitating the development of the borough's key economic sectors with a focus on clean growth and green innovation. Furthermore, the Draft Local Plan includes more detail in the 'Addressing Climate Change' chapter on plans to meet carbon neutrality. The Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) have all been assessed and boundaries proposed to be revised where appropriate as part of the Draft Local Plan. The Draft Local Plan has policies regarding the uses permitted within our BEAs (Policy E1) and the circumstances where exceptions may be permitted (Policy E2).

Table EE3: Responses submitted on the Economy and Employment Chapter and the council's response – Employment Allocations Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
	Historic England	A number of UDP sites contain designated heritage assets within their boundaries or are in close proximity whereby development may have an impact on setting. We understand that Heritage Impact Assessments have been drafted for sites, however, we cannot see these forming part of the current consultation.	Noted. The Draft Local Plan has Policy HE2 on securing the preservation and enhancement of Oldham's Heritage Assets which outlines that proposals that affect heritage assets will require the submission of a Heritage Statement.

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	If B1.1.28 refers to the site of the new secondary school in Diggle it needs to be removed.	Noted. The employment allocations have all been reviewed as part of the Draft Local Plan. Allocations proposed for housing and mixed-use development are identified in Policy H13 and those for office, industry and warehousing are identified in Policy E4.
Cllr Howard Sykes	Oldham Council	The list of Business Employment Areas (BEAs) shown on the map on page 67 is outdated. Suggest that the Local Plan correctly references the current status of the sites, and that there should be a requirement to identify new BEAs and SEAs not only to replace any lost, but to add to the number of BEAs and SEAs across the borough.	Noted. The Business and Employment Areas (BEAs) and Saddleworth Employment Areas (SEAs) have all been assessed as part of the Draft Local Plan and boundaries revised where appropriate. BEAs are listed in Policy E1.
Kellen Homes		Have interest in BEA 8 (Vernon Works), which an application is submitted for. Sets out details for redevelopment options for the above site and states employment is unviable. States the site is well suited to residential development and is identified in the SHLAA with details of sustainability. Request that the site is removed from BEA 8 and allocated for residential development.	Noted. The site known as Vernon Works has now been granted permission for residential development.
	Russell LDP	No comments on existing allocations. Supports the council's desire to provide diverse, suitable and attractive employment sites for existing businesses to grow and relocate to and to attract new businesses. Sets out the benefits that will come from the PfE Allocation at Stakehill. Supportive of the references to tackling the impact of Covid-19 and to deliver a thriving and inclusive economy. The allocation of employment sites which are able to meet the council's needs and market needs is of strategic importance.	Noted. Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. Allocations proposed for office, industry and warehousing are identified in Policy E4.

Name	Organisation Details	Summary of Response	Council's Response
	Natural England	Late Submission - Some of the saved UDP employment allocations are adjacent to or within 200m of Rochdale Canal Special Area of Conservation (SAC) and Rochdale Canal Site of Special Scientific Interest (SSSI). Any allocation which could have a likely significant effect on any internationally designated site should be assessed within the HRA.	Noted. A HRA will be done alongside the Draft Local Plan.

Table EE4: Responses submitted on the Economy and Employment Chapter and council's response – Employment Allocations Spatial Option

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	A combination of providing some new employment land and improving sustainable connectivity to existing and neighbouring districts key employment sites is supported.	Noted.
Mrs Wendy Cooper	Save Shaw Greenbelt Group	Oldham is seen as part of the Northern Gateway Project. This may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway.	Noted. JPA1 Northern Gateway and JPA2 Stakehill are allocations within the Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.



Table EE5: Responses submitted on the Economy and Employment Chapter and the council's response – Culture Question

Name	Organisation Details	Summary of Response	Council's Response
	Historic England	A policy on the protection of cultural venues is important. Historic England has been a key partner in the Cultural Recovery Fund. Protecting cultural heritage is valuable to learning, wellbeing and health. Oldham has a rich cultural heritage, and potential through the adaptation of buildings such as mills for more. Support the inclusion of such a policy in the local plan.	Noted. The Draft Local Plan includes Policy CO4 on cultural, community and health facilities and sets out that proposals for the loss of those facilities will only be permitted where certain criteria are met. Policy H4 sets out the council's approach to Oldham's Mills and Policy E3 Reuse and Redevelopment of Mill Buildings considers proposals for non-employment generating uses designated Business Employment Areas and elsewhere.
Mrs Sharon Hibbert	Saddleworth Parish Council	Support the inclusion of a policy in the local plan that protects and promotes cultural venues.	Noted. The Draft Local Plan includes Policy CO4 on maintaining and improving access to cultural, community and health facilities and sets out that proposals for the loss of those facilities will only be permitted where certain criteria are met.
Denise Luke		Oldham should protect and promote cultural venues.	Noted. The Draft Local Plan includes Policy CO4 on cultural, community and health facilities and sets out that proposals for the loss of those facilities will only be permitted where certain criteria are met.
Jean Betteridge	Oldham & Saddleworth Green Party	Support the inclusion of a policy in the local plan that protects and promotes cultural venues.	Noted. The Draft Local Plan includes Policy CO4 on cultural, community and health facilities and sets out that proposals for the loss of those facilities will only be permitted where certain criteria are met.

Table EE6: Responses submitted on the Economy and Employment Chapter and the council's response – Tourism Questions

Name	Organisation Details	Summary of Response	Council's Response
	Historic England	Oldham's distinctive historic character, ranging from Saddleworth villages through to Oldham Town Centre provided a unique sense of place. The council should utilise the opportunities offered by the Local Plan to maximise appropriate enhancement of heritage assets as a focus for increased tourism.	Noted. The Draft Local Plan includes Policy TM1 on tourism which sets out how the council will support new tourism related development with a focus on Oldham Town Centre and the borough's Green Infrastructure.
Mrs Sharon Hibbert	Saddleworth Parish Council	Oldham and the surrounding areas have a long and very honourable history of manufacturing. Sadly, Oldham offers little if any opportunity to visitors to view or understand its engineering heritage. In addition, Oldham has an enviable musical heritage and history of theatres. Develop a museum and cultural venue to portray and commemorate all three areas.	Noted.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		The approach to tourism is welcomed. Tourism is a key element in local economy and needs to be encouraged and managed. Not just about employment but people's wellbeing, recreation, culture and education. Reference to encouraging long stay visitors is welcomed. There is a growing need for overnight / long stay accommodation at appropriate locations within the countryside. Log cabins, camping sites and other recreational units should be welcomed	Noted. The Draft Local Plan includes Policy TM1 on tourism which sets out how the council will support new tourism related development with a focus on Oldham Town Centre and the borough's Green Infrastructure.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
		in appropriate rural locations and this should form part of the Local Plan tourism policies.	
Mrs Jane Millet		People are attracted to natural areas. Promote and invest in our beautiful green areas. Oldham has a wonderful history, we should be proud of it.	Noted. The Draft Local Plan includes Policy TM1 on tourism which sets out ways we will promote our green infrastructure assets.
Denise Luke		Tourism is likely to remain focussed on rural areas and overcrowding in well promoted spots ruins them, should promote more diverse places to visit.	Noted. The Draft Local Plan includes Policy TM1 on tourism which sets out ways we will promote our assets within Oldham Town Centre and our green infrastructure assets.
Jean Betteridge	Oldham & Saddleworth Green Party	Yes to allocating sites for tourism, especially in town centre. Central to managing the number of visitors in a sustainable manner must be the commitment to managing the impact on the environment and wildlife. We support the development of Northern Roots as a sustainable attraction.	Noted. The Draft Local Plan includes Policy TM1 on tourism which sets out ways we will promote our assets within Oldham Town Centre and our green infrastructure assets, including Northern Roots.

Table EE7: Responses submitted on the Economy and Employment Chapter and the council's response – Farm Diversification Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	Yes Oldham should continue to have a policy that supports the diversification of the rural economy.	Noted. The Draft Local Plan includes Policy TM2 on Farm Diversification which sets out the circumstances in which proposals for farm diversification that support the rural economy will be supported.

Name	Organisation Details	Summary of Response	Council's Response
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Support the retention of Policy OE1.11 from the UDP, it needs updating and given more emphasis. Uses such as overnight stay accommodation food and drink, hospitality and equestrian and educational activities should be encouraged. Other non-recreational farm diversification activities may also be encouraged where this will enable landscape and biodiversity improvement.	Noted. The Draft Local Plan includes Policy TM2 on Farm Diversification which sets out the circumstances in which proposals for farm diversification that support the rural economy will be supported.
Denise Luke		The diversification of the rural economy should be supported and promoted.	Noted. The Draft Local Plan includes Policy TM2 on Farm Diversification which sets out the circumstances in which proposals for farm diversification that support the rural economy will be supported.
Jean Betteridge	Oldham & Saddleworth Green Party	Should continue to have a policy that supports the diversification of the rural economy.	Noted. The Draft Local Plan includes Policy TM2 on Farm Diversification which sets out the circumstances in which proposals for farm diversification that support the rural economy will be supported.

## Our Centres

Table C1: Responses submitted on the Our Centres Chapter and the council's response- General

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support a clearer description of the different towns' centres, in paragraph 16.8 in terms of what is there now, to establish benchmarks.	Noted.
Cllr Howard Sykes	Oldham Council	Local Plan should have as an objective the creation and maintenance of vibrant district centres. These centres should offer a variety of shops, leisure outlets, medical and community facilities. The housing offer should be reflected with appropriate housing for each area, rather than there being a blanket approach and should include the provision of more housing for social rent, rather than simply affordable housing. Major new housing development should only take place after enhancements to the capacity of local infrastructure. Need to bring long-term empty and derelict buildings in town centres back into use. Should be a greater commitment to use Section 106 monies to enhance infrastructure and facilities in areas directly impacted by development.	Noted. The Draft Local Plan includes Plan Objective 4 which is 'Supporting the regeneration of Oldham Town Centre and creating thriving centres'. The policies included in Draft Local Plan chapter on Our Centres aim to diversify our centres to promote vitality and vibrancy and their long-term sustainable future, including outlining that the provision of homes will generally be supported in our centres where it is demonstrated the residential use will not be detrimental to the vitality and viability of the centre.

Table C2: Responses submitted on the Our Centres Chapter and the council's response - Retail and Leisure Questions

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support replacing the existing retail hierarchy, which does not reflect the retail distribution of the area. Following groupings suggested: 1. Oldham Town Centre. 2. Other Town Centres. 3. Elk Retail Park. 4. Stand - alone supermarkets, outside of the above centres. 5. Local shopping parades or groups of shops. 6. Retail locations in business parks. 7. Isolated shops.	Noted. The retail hierarchy is set out in Policy C1 of the Draft Local Plan. It is based on the Retail and Leisure Study evidence base document and is therefore considered appropriate.
Noel Mahon	Save Royton's Green Belt Community Group	Further clarity is sought as to how GMSF 2020 density assumptions will be applied. Only Oldham Town Centre should be categorised as a designated town centre and as large designated centre, while other town centres such as Royton and Shaw should be categorised as other designated centres.	Noted. The Draft Local Plan includes Policy H3 on the Density of New Housing. This reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to particular locations.
	Historic England	Oldham's centres are generally high density, with a legacy of former industrial activity and commercial use. When planning new housing within centres it is important to understand the context, including utilising conservation area appraisals and management plans, townscape character assessments and undertaking new evidence such as Heritage Impact Assessments for specific sites, or Design Codes and Design Guides to influence policies with the local plan. The plan should seek to conserve and enhance the distinctive character of its centres whilst seeking to find new uses for assets at risk of neglect or decay.	Noted. The Draft Local Plan has a policy on securing the preservation and enhancement of Oldham's Heritage Assets which outlines that proposals that affect heritage assets will require the submission of a Heritage Statement. In addition, there is Policy OTC2 on protecting and enhancing Oldham Town Centre's Conservation Area and several design-related policies in the Creating a Better and Beautiful Oldham chapter.
Mrs Rose Johnstone		Oldham Town Centre is not particularly well frequented and has lost a lot of shops so therefore centre can be made smaller. Need to work on the	Noted. Policies relating to Oldham Town Centre can be found in the 'Oldham Town Centre' chapter. The retail hierarchy proposed in Policy C1 includes Shaw

Name	Organisation Details	Summary of Response	Council's Response
		evening entertainment to bring people in. No mention of Shaw Centre. In Sholver there are no shopping centres near.	as one of the borough's other centres and policies set out in the Our Centres chapter sets out our planning approach.
Ms Deborah Wroe		The type of housing suitable for centres would seem to be single person households and older people.	Noted. Draft Local Plan Policy H2 sets out that new residential developments should contribute to a diverse housing mix across the borough and states that within Oldham Town Centre, Oldham's other centres and within 400m of transport hubs , the housing mix shall predominantly be for apartments,
Mrs Sharon Hibbert	Saddleworth Parish Council	Hierarchy should include other areas, particularly Saddleworth. Agree with the boundary amendments proposed.	Noted. The retail hierarchy is set out in Policy C1 of the Draft Local Plan. It is based on the Retail and Leisure Study evidence base document and is therefore considered appropriate.
Mr Tom Whitehead	Brookhouse Group Ltd	Brookhouse owns land in the following locations - Failsworth Centre, Alexandra Retail Park and B&Q, Chadderton Way. Support the council's acknowledgement that retail markets have been declining and COVID-19 has exacerbated that situation. Requests that a new policy is formulated expressing support for a wide range of town centre uses (within Class E and other classes including Sui Generis uses) within centres. The policy should also recognise the important role that residential development plays in supporting the vitality and viability of town centres. Request a minor amendment to Oldham Town Centre boundary to extend it south to include Alexandra Retail Park and sets out reasons why. Efforts should be made to supporting physical retail. Consider that the policy objective to introduce a lower than nationally set threshold for assessing impact does not meet its intended objectives and is not supported by evidence. The Retail & Leisure	Noted. Policies in the Draft Local Plan support main town centre uses, however Policy C4 sets out that non-main town centre uses will only be permitted where they meet certain criteria. Oldham Town Centre boundary has been assessed as part of the Draft Local Plan and proposed to be revised so that it more closely reflects the council's Creating a Better Place framework, this does not include land at Alexandra Retail Park. The thresholds used for assessing impact are based on the Retail & Leisure Study evidence base document and therefore considered appropriate.

Name	Organisation Details	Summary of Response	Council's Response
		Study does not provide evidence to support the lowering of the threshold. Reasons set out as to why the thresholds should not be lower than those set out in NPPF.	
Denise Luke		Support retail hierarchy. Lees Centre has limited retail with recent loss of banks. There is planned increase in housing in Lees / Springhead which should mean there is a priority for development of retail and other services.	Noted.



Table C3: Responses submitted on the Our Centres Chapter and the council's response - Oldham Town Centre Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	The council should seek to identify further development opportunities on the edges of Oldham Town Centre for high-density mixed-use developments.	Noted. Allocations proposed for housing and mixed-use development are identified in Draft Local Plan Policy H13.
	Historic England	It may be beneficial for a bespoke policy on Oldham Town Centre which could for example include protection of shopfronts, the reuse and adaptation of vacant buildings, public realm etc.	Noted. The Draft Local Plan includes several policies for Oldham Town Centre OTC1-OTC5 within their own chapter.
Mrs Jane Millet		Visitors do not visit Oldham Town in the evening it is unsafe with lots of underage drinking and drug usage, perhaps this should be concentrated on.	Noted. Policy OTC1 sets out detail for the cultural and creative quarter which is the focus for the improved night-time and visitor economy.
Joel Owen	First Choice Homes	It is important that the Town Centre has its own policy within the Local Plan, with a clear approach on how to maximise the rejuvenation of the town centre maximising the investment secured from the Town Centre Fund. A flexible approach rather than a zonal approach may be best to support the integrated mix required to deliver a sustainable and thriving town centre.	Noted. The Draft Local Plan includes several policies for Oldham Town Centre OTC1-OTC5 within their own chapter.
Jean Betteridge	Oldham & Saddleworth Green Party	This is a vital opportunity to make Oldham Town Centre more environmentally attractive and sustainable. Oldham Council's commitments to combating climate change, positive environmental outcomes, healthy living and reducing inequalities must be at the heart of the Town Centre Plan. The town centre should have its own policy, we agree with tightly drawn shopping boundaries and more open	Noted. Tackling climate change and promoting health and wellbeing are central themes running through the Draft Local Plan. The plan also includes several policies for Oldham Town Centre OTC1-OTC5 within their own chapter.

Name	Organisation Details	Summary of Response	Council's Response
		space would be welcomed such as the linear park and we agree with an Article 4 in relation to offices to residential.	
Richard Clowes	TfGM	Late Submission - Development opportunities on the edges of Oldham Town Centre for high-density mixed use developments is seen as fundamental to achieving many of the objectives of the Local Plan. Oldham Town Centre is the most accessible location. Higher densities would ensure most effective use of brownfield land and ensure more people could access Oldham Town Centre by sustainable travel modes reducing the need to travel by car, mixed use developments would ensure residential development would have access to local services. There is a need to ensure that high quality walking and cycling routes into the Town Centre are provided and any severance issues are resolved. There is also an opportunity to ensure that the walking and cycling routes through edge of town centre locations can improve access to the town centre for existing communities.	Noted. Draft Local Plan H3 Density of New Housing reflects Places for Everyone Policy JP-H4 and provides more detail as to which minimum densities apply to particular locations across Oldham. Within Oldham Town Centre, Oldham's other centres and within 400m of transport hubs, Policy H2 sets out that the housing mix shall predominantly be for apartments reflecting density requirements. OTC4 Green Infrastructure within and around Oldham Town Centre sets out that the council will promote high-quality active routes in Oldham Town Centre as well as using open space as stepping-stones through the town centre.

## Addressing Climate Change

Table CC1: Responses submitted on the Addressing Climate Change Chapter and council’s response – General

Full Name	Organisation Details	Summary of Response	Oldham Council
Mr and Mrs Briggs		Support improving water quality in waterways as set out in paragraph 17.31.	Noted.
Cllr Howard Sykes	Oldham Council	Local Plan should look to incorporate planning conditions that will assist in achieving a carbon-neutral borough by 2030. Future housing developments should incorporate electric vehicle charging points. Should look at eco-friendly, repurposed building materials, enhanced insulation, and a requirement to provide for renewable technologies. There should be a requirement for all developments to include SUDS unless this is demonstrated to be unfeasible. Where possible, new developments should be sited near to existing services and facilities, and alongside public transport routes or, in larger developments, where these do not exist, new provision should be catered for within the development plan in line 20-minute neighbourhoods. Community facilities should be made from sustainable materials. New homes to be routinely provided with access to excellent broadband provision. Developments on flood plains should be curtailed and provision made for enhanced flood protection for existing properties. Planning conditions should promote best practice in	Noted. The policies within the Addressing Climate Change chapter outline how the Draft Local Plan will assist in reaching achieving a carbon-neutral borough by 2030, the approach towards sustainable construction and the approach to SUDs and flood risk. Policy T4 sets out the approach for electric vehicle charging points. Policy CO9 sets out how the council will support development proposals that are in sustainable and accessible locations. It is not within the remit of the Local Plan to set speed limits.

Full Name	Organisation Details	Summary of Response	Oldham Council
		the design of buildings to counter the impact of rising temperatures and heatwaves. Would like to see provision for better monitoring of NO2 and particulate levels, and tailor-made transport solutions to reduce pollution. The introduction of a blanket 20mph maximum speed limit on the borough's residential roads would reduce air pollution, deaths and injuries.	
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Support for any climate change policy. Sustainable surface water management and the efficient use of water should be critical elements of any such policy. Encourage the policy on climate change to be intrinsically linked to wider policies in the Local Plan including those relating to the detailed design of new developments and the provision of green and blue infrastructure. Any climate change policy should give appropriate emphasis to green and blue infrastructure, natural flood management techniques, multi-functional sustainable drainage, designing new development so that it is resilient to the challenges of future climate change and the incorporation of water supply efficiency measures.	Noted. The Draft Local Plan has policies CC3 and CC4 that outline our approach to surface water and water efficiency. Tackling climate change is a key thread throughout the Draft Local Plan.
Richard Clowes	TfGM	Late Submission - Alongside reference to Oldham's Green Deal this chapter could also make reference to Greater Manchester's Environment Plan targets.	Noted. Reference to the Greater Manchester Environment Plan added to the chapter.

Table CC2: Responses submitted on the Addressing Climate Change Chapter and council’s response – Renewable Energy and Low Carbon Questions

Full Name	Organisation Details	Summary of Response	Council’s Response
Joanne Harding	Home Builders Federation Ltd	Supportive of the use of modern methods of construction (MMC) but considers that a policy to set a preference for the use of MMC is unnecessary. The home building industry is a progressive industry that uses a range of innovative methods. The council may need to consider how the promotion of MMC would sit alongside other policies e.g., design or housing mix.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out that modern methods of construction will be encouraged where appropriate.
	Historic England	Policies on climate change should recognise sustainability over the long-term, and the benefits of sympathetic restoration, retention, refurbishment and retrofit of historic buildings, whilst seeking to avoid demolition and replacement. The carbon impact of buildings is not only in their operational carbon or energy efficiency it is also in the carbon embodied in their materials and labour. When taking a long view older buildings and traditional materials are often extremely effective. Policies on climate change should refer to importance of regular maintenance, by caring for and reusing heritage assets. It is important that there is distinction between historic and modern fabric. Policies should refer to the whole-building approach. In respect of materials, reference should be made for the need for durable, sustainably sourced materials regarding linking to circular economy and whole life-cycle carbon assessment in policy. Recommend the justification to the policy refer to Historic England guidance which includes Historic	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting including what will be required in historic buildings. Reference to the Historic England guidance note added to the reasoned justification.

Full Name	Organisation Details	Summary of Response	Council's Response
		England Advice Note 14 Energy Efficiency and Traditional Homes (July 2020). Suggest an SPD on energy efficiency and climate change to support the plan.	
Mrs Wendy Cooper	Save Shaw Greenbelt Group	Renewable energy systems such as solar panels and ground source heat pumps should be common with regards to new builds and older properties. New builds should conform to the 'Passive House Specification'. The proposal to build an incinerator burning waste at Broadbent Moss goes against common sense.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out how developments will be required to achieve high standards of sustainable design and construction.
Mrs Sharon Hibbert	Saddleworth Parish Council	The best way for the Local Plan to assist in carbon neutrality is to map opportunities for renewable and low carbon energy, the Local Plan should set a preference for modern methods of construction in housing developments where suitable and possible.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out how developments will be required to achieve high standards of sustainable design and construction. Policy CC2 explains how the Local Area Energy Plan identifies opportunities for low carbon energy including solar, hydrogen, heat pumps, electric vehicle charging and a district heat network and in addition, the council is working on an Oldham Mine Water Heat Network project.
Ms Deborah Wroe		What is the plan on fuel poverty?	Noted. The policies within the Addressing Climate Change chapter will help address fuel poverty.
Mrs Jane Millet		Protecting green areas promotes our carbon footprint.	Noted.
	Dobcross Village Community Association	The Local Plan must also assist carbon neutrality by ensuring that the carbon footprint of any new development is assessed as part of the planning process, including a realistic assessment of the use of	Noted. The policies within the Addressing Climate Change chapter outline how the plan will assist in reaching achieving a carbon-neutral borough by 2030.

Full Name	Organisation Details	Summary of Response	Council's Response
		private fossil fuel transport as a consequence of that development.	
Joel Owen	First Choice Homes	Believe that the St Marys Biomass system is a key essential building block of an Oldham sustainable district heating system, and a vital component in progressing the borough towards achieving its ambitious carbon neutral targets. FCHO is supportive of the objective to use Modern Methods of Construction (MMC) but recommends any policy wording should emphasise the encouragement in the use of MMC rather than a preference.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out that modern methods of construction will be encouraged where appropriate.
Jean Betteridge	Oldham & Saddleworth Green Party	We welcome and support Oldham Council's Green New Deal Strategy and Climate Emergency Declaration. We agree that the Local Plan should assist carbon neutrality by mapping opportunities for renewable and low carbon energy, including heat networks. We agree that the Local Plan should set a preference for Modern Methods of Construction in housing developments.	Noted.
Lisa Smirk	Save Shaw's Green Belt	Renewable energy systems such as solar panels and ground source heat pumps should be common with regards to new builds and older properties. New builds should conform to the 'Passive House Specification'. The proposal to build an incinerator burning waste at Broadbent Moss goes against common sense.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out how developments will be required to achieve high standards of sustainable design and construction.

<b>Full Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr Adam Brennan	United Utilities Water Limited	Late Submission - The Local Plan should set a requirement for Modern Methods of Construction in housing developments. This should include standards for water efficiency. Water efficiency is linked to energy use and therefore makes a valuable contribution to reducing energy use. Provide further commentary on the incorporation of a water efficiency policy in your emerging Local Plan including the justifying evidence and recommended policy wording.	Noted. The Draft Local Plan includes Policy CC1 on sustainable construction, energy efficiency and retrofitting which sets out that modern methods of construction will be encouraged where appropriate and Policy CC5 that outlines our approach to water efficiency.

Table CC3: Responses submitted on the Addressing Climate Change Chapter and council's response – Flood Risk Questions

<b>Full Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	Greater Manchester's existing flood risk standards should be aspirational for brownfield sites. Brownfield site should not be refused purely on the basis that a higher standard cannot be met, if the national guideline to not worsen drainage is deliverable. Flood Risk CDA policy should continue to apply to all greenfield development. However, it is arguably overkill for brownfield development if it is already integrated into the drainage system and there are no flooding issues. Oldham should have a SUDs requirement policy for greenfield development. It should not require such a policy for brownfield.	Noted. The Draft Local Plan includes Policy CC3 on managing flood risk including in Critical Drainage Areas (CDAs). Policy CC4 in the Draft Local Plan sets out our approach to SUDs where it has been considered appropriate to require developments on greenfield sites to achieve greenfield run off rates and developments on brownfield sites should aim to achieve greenfield run off rates, particularly within CDAs.



Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	The discharge rate chosen should come from specialist advice needed, also, local Saddleworth knowledge needs to be tapped. Agree that CDA areas should continue to be required to submit a FRA, Oldham should have a SUDs requirement policy and most definitely agree that we should be using natura processes to mitigate flood risk.	Noted. Policy CC4 in the Draft Local Plan sets out our approach to SUDs and Critical Drainage Areas.
Mrs Jane Millet		Should not be building on natural flood areas.	Noted. The Draft Local Plan includes Policy CC3 on managing flood risk which sets out no development shall take place in Flood Zone 3b unless in exceptional circumstances such as for essential infrastructure, which must still pass the Exception Test, or where development is water compatible.
Sarah Welsh	Peak District National Park Authority	The Moors for The Future Project is mentioned but there is no acknowledgment of the importance of the project in reducing flood risk and maintaining carbon storage and improving water quality.	Noted. The Spatial Portrait in the Draft Local Plan outlines the importance of the Moors for The Future project.
	Russell LDP	Support policies for managing surface water runoff which accord with either national guidance or the standards referenced in the Greater Manchester SRFA. There should be a policy requirement for all developments to incorporate SUDS unless it is unfeasible to do so supported by the Flood and Water Management Act 2010 and NPPF. Agree with using natural processes as a way to mitigate flood risk. The requirement should be based on whether it is technically unfeasible or unviable to do so.	Noted. Policy CC4 in the Draft Local Plan sets out our approach to SUDs.
Mrs Natalie Blackston	First Choice Homes	Supportive of practical and feasible proposals to prevent the risk of flooding to existing and future assets across the borough.	Noted.

Full Name	Organisation Details	Summary of Response	Council's Response
Jean Betteridge	Oldham & Saddleworth Green Party	There should be requirements for using porous materials in new developments for essential exterior hard surfaces. Agree with using natural processes to mitigate flood risk and would include investigating the reintroduction of beavers in the borough.	Noted. The approach to managing flood risk is set out in Draft Local Plan policy CC3.
Sylvia Whittingham	Environment Agency	Late Submission - Satisfied that the Local Plan has taken flood risk into account. We support the consideration of natural flood management and encourage discussion with developers that considers the potential benefits of natural processes and how slow the flow measures may help to mitigate flood risk. Particularly in locations across the Oldham area that are situated within steep catchments, where the onset of flooding can occur quickly. Would encourage the development of specific policy promoting SUDs. Encourage the positive and continued engagement of the LPA with the LLFA in helping to manage and reduce flood risk across the Oldham area. Would recommend that any proposed development is within the flood zone 1 area and that the LLFA engineers provide some advice on surface water flood risk and flood risk from the ordinary watercourses present on site.	Noted. The Draft Local Plan includes Policy CC3 on managing flood risk and Policy CC4 which sets out our approach to surface water and SUDs.
	Natural England	Late Submission - Welcomes the inclusion of all developments being required to incorporate SUDs. This will positively contribute to reducing flood risk by working with natural processes. Also welcomes the policy of using natural processes to mitigate flood risk. Advise that where possible, you may wish to link this to your Green Infrastructure policies. We also advise the Local Plan should contain policies which	Noted. The Draft Local Plan includes Policy CC3 on managing flood risk and Policy CC4 which sets out our approach to surface water and SUDs. Policy N3 on enhancing Green Infrastructure also outlines how our Green Infrastructure assets can serve many functions, one of which being slowing the flow and a quality water environment.

Full Name	Organisation Details	Summary of Response	Council's Response
		protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on International sites, SSSIs and local sites which contribute to a wider ecological network.	
Mr Adam Brennan	United Utilities Water Limited	<p>Late Submission - New development should manage foul and surface water in a sustainable way. Recommends that the issues of flood risk and surface water management are dealt with as two separate policies. Recommend that the Local Plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations. Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. Development proposals on water catchment land can have an impact on water supply resources and therefore recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Include example policy for the management of surface water. With respect to previously developed land, we would request that the first preference should be for applications to target a reduction to a greenfield rate of run-off. Request that any reduction in surface water discharge on previously developed sites should be fully reflective of any policy determined via a strategic flood risk assessment. Support the submission of a flood risk assessment for all sites which are 0.5 hectares within</p>	<p>Noted. The Draft Local Plan includes Policy CC3 on managing flood risk including in Critical Drainage Areas and Policy CC4 sets out our approach to SUDs where it has been considered appropriate to require developments on greenfield sites to achieve greenfield run off rates and developments on brownfield sites should aim to achieve greenfield run off rates, particularly within CDAs. Policy CC5 outlines our approach to water efficiency and Policy CC6 regarding groundwater protection zones.</p>

Full Name	Organisation Details	Summary of Response	Council's Response
		critical drainage areas. Request that all sites regardless of their critical drainage location should be asked to provide clear details of how they intend to drain a site via the submission of a drainage statement. Encourage a SUDS policy. Request that policy is clear that all sites should give consideration to the wide range of SuDS. UU is supportive of natural flood management techniques to manage flood risk.	

## Natural Environmental and Open Land

Table NE1: Responses submitted on The Natural Environment and Open Land Chapter – General

Name	Organisation Details	Summary of Response	Council's Response
Maxine Lay		No building on Green land.	Noted.
Paul Burns		Lockdown has showed how important the natural environment is for mental health. Links to various reports sent which highlight the importance of green spaces for people and for wildlife. Building on green space is to be avoided. Agree that replanting hedgerows is an excellent idea as this would greatly benefit wildlife.	Noted.

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Mrs Wendy Cooper	Save Shaw Greenbelt Group	Some of the Green Belt enhancement proposals come across as gimmicks. The focus needs to be on the role of the Green Belt in combatting climate change and improving biodiversity. We support the strategy of re-planting of hedgerows on farmland or where barbed wire is currently used. There should be no pre-emptive removal of the Protected Open Land (OPOL) designation of OPOL9, OPOL10 and OPOL22 which are allocated in the Greater Manchester Spatial Framework/Places for Everyone. Since both OPOL10 (Shawside) and OPOL22 (Cowlshaw) both meet the criteria for Local Green Space (LGS), then they should be awarded the designation if these allocations are ultimately removed from the GMSF/PFE, given that the decision not to designate them as LGS is contingent on their allocation.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability for redesignation as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Sarah Welsh	Peak District National Park Authority	Do not state a quarter of the borough is within the national park in the text.	Noted. There is Policy OL1 in the Draft Local Plan on the Consideration for the Peak District National Park.
Brian Beedham		The planting of trees, hedges and green spaces must be considered. Green spaces must be protected. This will help in the war against global warming. The Green Belt should be preserved.	Noted. There is Policy N4 in the Draft Local Plan on tree replacement and there are several policies that deal with the protection of green spaces, including Policy N1 Protecting Nature, Policy N3 Enhancing Green Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.

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Joel Owen	First Choice Homes	As a general principle we agree with the importance of enhancement and protection of the green environment. We also recommend a balanced approach when considering development opportunities adjacent to or on these green spaces, by exception for affordable homes, where access to this provision in these locations is low or non-existent.	Noted.
Mr Christopher Tansley		Oldham's jewel in the crown is its countryside which should be protected. Green Belt and OPOL should not be developed under any circumstances. Disagree with any proposals to develop on Green Belt and OPOL.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. An assessment of the OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . There are several policies that deal with the protection of the Green Belt and LGS, including Policy OL2 Protecting and enhancing Oldham's Green Belt, Policy OL3 Extensions and alterations to existing buildings within the Green Belt and Policy OL4 Local Green Space.
Greg Hull		All Green Belt should be protected from development until the brownfield supply has been over 90% exhausted.	The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. Policy OL2 seeks to protecting and enhance Oldham's Green Belt, whilst Policy OL3 considers extensions and alterations to existing buildings within the Green Belt.

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Stephanie Costello		While I appreciate the need to provide additional homes within the UK I would implore those who hold the power to ensure that local Green Belt land remains exactly that.	The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. Policy OL2 seeks to protecting and enhance Oldham's Green Belt, whilst Policy OL3 considers extensions and alterations to existing buildings within the Green Belt.
Katherine Grant		Green Belt must be given greater protection.	The Draft Local Plan seeks to protect Green Belt in line with national planning policy as set out Draft Local plan Policy OL2.
Darryl Nolan		Oldham should not release any Green Belt or green spaces for housing or other development. Oldham should seek to improve and manage and develop green spaces for the benefit of the local environment.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. There are several policies that deal with the protection of the Green Belt and green spaces, including Policy OL2 Protecting and enhancing Oldham's Green Belt, Policy OL3 Extensions and alterations to existing buildings within the Green Belt, Policy OL4 Local Green Space, Policy N3 Enhancing Green Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space.
Jackie Copley	The Lancashire Branch of the Campaign to Protect Rural England	Late Submission - Outlines that the Climate Emergency is the biggest threat facing our countryside, and planet. Want Green Belt protected from inappropriate development. Would like to engage regarding how we are going to respond to the climate emergency. Would like Oldham's environmental assets and rural landscapes to be promoted, protected and enhanced through the Local	Tackling climate change is a key thread throughout the Draft Local Plan. With regards to the Green Belt the Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.

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		Plan policies, are opposed to the loss of valued open green space, as it undermines the viability of existing brownfield sites.	
Kevin Hatherill		<p>Protect green spaces for the wellbeing of residents now and for future generations. Beyond wellbeing we need to be protecting the biodiversity and even reversing the damage that humanity has done to the natural world. Please also be mindful that continued development removes flood plane and soakaway, which would further exacerbate the flooding problems experienced in Shaw.</p> <p>Do not remove OPOL protected status from the following areas designated in GMSF: OPOL9, OPOL10 (Shawside), OPOL22 (Cowlshaw). In particular OPOL10 and OPOL22 are compliant with the criteria for Local Green Spaces (LGS) and should be removed from GMSF and Places for Everyone.</p>	<p>Noted. There are several policies within the Draft Local Plan that deal with the protection of the green spaces, including Policy OL2 Protecting and enhancing Oldham's Green Belt, Policy OL3 Extensions and alterations to existing buildings within the Green Belt, Policy OL4 Local Green Space, Policy N3 Enhancing Green Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. An assessment of OPOLs has been undertaken as part of the Review Local Plan to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a>. Finally, Policy CC3 sets out the approach to managing flood risk.</p>
Denise Luke		Concern that PfE will erode the amount of Green Belt..	<p>Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.</p>



Table NE2: Responses submitted on The Natural Environment and Open Land Chapter and the council's response - Green Belt Questions

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support improving access to Tandle Hill, especially the top surface at the upper end of Cinder Hill Lane.	Noted.
Noel Mahon	Save Royton's Green Belt Community Group	Some of the proposals come across as gimmicks. The focus needs to be squarely on role of the Green Belt in combatting climate change and improving biodiversity. Support the strategy of re-planting of hedgerows on farmland or where barbed wire is currently used as a field boundary.	Noted. The Draft Local Plan includes Policy OL2 on the protection and enhancement of Oldham's Green Belt and Policy N3 on enhancing Green Infrastructure. Both policies have been informed by the Green Infrastructure Strategy that identify opportunities where hedgerows can be enhanced.
Mrs Sharon Hibbert	Saddleworth Parish Council	Priorities should be the maintenance of footpaths and walls and protection of trees and shrubbery.	Noted.

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Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Cannot meet housing aspirations without building on open land. It is noted that a review of the Green Belt is being done via PfE and the Oldham Local Plan will not address Green Belt boundary revisions. The PfE has not reviewed the Green Belt boundaries, it has identified strategic areas for development and proposed these are taken out of the Green Belt. There has not been a thorough review of Green Belt boundaries. There are anomalies where the original Green Belt boundaries were badly drawn or where circumstances have changed. Where appropriate some land can be released from the Green Belt and other land included without having a significant effect in the NPPF. A tidying up and release of smaller sites is encouraged.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.
Mrs Jane Millet		If the aim is and protect open land why are you even considering building on vast areas of green land such as Beal Valley / Broadbent Moss.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Cllr Howard Sykes	Oldham Council	Wish to see clear commitment in the Local Plan to brownfield land motion. Local Plan should provide strong protection from developments for Green Belt, OPOL and other green spaces.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. There are several policies that deal with the protection of the Green Belt and green spaces, including Policy OL2 Protecting and enhancing Oldham's Green Belt, Policy OL3 Extensions and alterations to existing buildings within the Green Belt, Policy OL4 Local Green Space, Policy N3 Enhancing

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			Green Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space.
Denise Luke		The priority should be to maintain and enhance the pattern of traditional species rich hedgerow field boundaries, stone walling and woodland within the wider landscape. Other enhancements could include to protect ancient woodland and unique and typical habitats. Protect habitats of wildlife including red list birds and endangered species. Identify and protect at risk habitats and species. Maintain the characteristic landscapes of Oldham.	Noted. The Draft Local Plan includes Policy OL2 on the protection and enhancement of Oldham's Green Belt and Policy N3 on enhancing Green Infrastructure. Both policies have been informed by Oldham's Green Infrastructure Strategy and the Greater Manchester Green Belt Study Identification of Opportunities to Enhance the Beneficial Use of the Green Belt document, both of which Strategy identify opportunities for enhancement.
	Russell LDP	Supports references to the review of the Green Belt boundary being undertaken through the PfE. Supports a potential policy of Green Belt enhancement opportunities. Sets out some specifics regarding the Stakehill allocation in PfE in relation to ecological issues and Green Belt enhancements.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. Draft Local Plan Policy OL2 seeks to protect and enhance of Oldham's Green Belt.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Green Belt - The extent of the new Green Belt boundaries proposed within PfE needs to be investigated to ensure the site opportunities and constraints in the Broadbent Moss are fully understood and implemented into the final allocation / green belt boundary.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Tracy Woodward	Save Chadderton's Greenbelt Committee.	All Green Belt should be protected from development until the brownfield supply has been over 90% exhausted.	The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.

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			Policy OL2 seeks to protecting and enhance Oldham's Green Belt, whilst Policy OL3 considers extensions and alterations to existing buildings within the Green Belt.
Mrs Tracy Woodward		All Green Belt should be protected from development until the brownfield supply has been over 90% exhausted.	The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken. Policy OL2 seeks to protecting and enhance Oldham's Green Belt, whilst Policy OL3 considers extensions and alterations to existing buildings within the Green Belt.
Lisa Smirk	Save Shaw's Green Belt	Some of the proposals come across as gimmicks. The focus needs to be squarely on role of the Green Belt in combatting climate change and improving biodiversity. We support the strategy of re-planting of hedgerows on farmland or where barbed wire is currently used as a field boundary.	Noted. The Draft Local Plan includes Policy OL2 on the protection and enhancement of Oldham's Green Belt and Policy N3 on enhancing Green Infrastructure. Both policies have been informed by the Green Infrastructure Strategy that identify opportunities where hedgerows can be enhanced.
Jean Betteridge	Oldham & Saddleworth Green Party	Welcome the suggestions for potential enhancement opportunities. When looking at the development of visitor facilities the impact on the environment and wildlife needs to be fully investigated and managed and the lessons and experiences at Dove Stone drawn on.	Noted.
Sylvia Whittingham	Environment Agency	Late Submission – Several enhancement opportunities in relation to river corridors have been listed. Support a policy that places emphasis on ensuring that there is a high-quality network of green infrastructure is therefore vital.	Noted.

Name	Organisation Details	Summary of Response	Council's Response
Richard Clowes	TfGM	Late Submission - Potential Green Belt Enhancement Opportunities - This table makes reference to "Extend / upgrade the Beeway network improvements to improve off road cycle access and walking routes." This should be changed to "the Bee Network".	Noted.

Table NE3: Responses submitted on The Natural Environment and Open Land Chapter and council's response - Local Green Space Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	Agree that the sites that have met the Local Green Space criteria should be designated as such. In addition, there should be no pre-emptive removal of the OPOL designation of OPOL9, OPOL10 and OPOL22 which are allocated in the Greater Manchester Spatial Framework/Places for Everyone. Since both OPOL10 (Shawside) and OPOL22 (Cowlshaw) both meet the criteria for Local Green Space, then they should be awarded the designation if these allocations are ultimately removed from the GMSF/PFE, given that the decision not to designate them as LGS is contingent on their allocation.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). These are designated through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Kevin Hatherill		The council should be seeking to protect such spaces for resident wellbeing and biodiversity.	There are several policies that deal with the protection of the borough's green spaces, including Policy OL4 Local Green Space, Policy N3 Enhancing Green

Name	Organisation Details	Summary of Response	Council's Response
		Comments in relation to OPOLs proposed for development under PFE.	Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Mrs Helen Poole		There is nothing in the NPPF that requires that OPOL be renamed LGS. OPOL and LGS are not one and the same and cannot be treated as such. The two meet different criteria and have very different and legitimate functions in protecting green spaces from inappropriate development. Outlines several reasons why they are not the same designation. Comments submitted regarding the Local Green Space Assessment. Site specific comments made in relation to Pearly Bank in Sholver supporting its inclusion as LGS. Would also like to see land at Hodge Clough in Sholver designated as LGS and sets out the reasons why.	Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be designated as Local Green Space (LGS). The methodology and evidence for identifying, and redesignating OPOL as, LGS is set out in the <a href="#">Local Green Space Assessment</a> . The Draft Local Plan is also proposing that the land between Pearly Bank and Longfellow Crescent in Sholver be designated as LGS, which was a community suggestion. In relation to Hodge Clough, from an informal judgement against the LGS criteria officers do not feel that this site is considered suitable as a LGS.
Mrs Sharon Hibbert	Saddleworth Parish Council	Agree that the sites that have met the Local Green Space criteria should be designated as such. The Dacres, Wall Hill and Stonewood sites are recommended to be allocated Green Belt on a high priority basis. All OPOL areas are important and merit full protection. Any sites not already designated that may meet the Local Green Space criteria will be listed in Saddleworth Parish Council's Neighbourhood Plan. Inappropriate development should not occur in these areas and strict measures	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions. However, a 'tidy up' of minor boundaries of a technical mapping nature has been undertaken.

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		need to be enforced to prevent it occurring. If it still occurs, then stiff penalties need to be applied.	
Debbie Hoult		Would like land at Pearly Bank protected from future development. It is valuable to the local community and to wildlife.	Noted. The Draft Local Plan is proposing that the land between Pearly Bank and Longfellow Crescent in Sholver be designated as LGS as set out in Policy OL4 on the protection and enhancement of Local Green Spaces.
Debra Taylor		Supports land at Pearly Bank being designated as Local Green Space. Would like OPOL 9 and 10 to be reassessed as they will be afforded no protection against development otherwise. Believes Hodge Clough meets the criteria of Local Green Space and would like it to be considered as such as part of the Local Plan.	Noted. A review of OPOLs has been undertaken as part of the Review Local Plan to determine their suitability to be designated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . The Draft Local Plan is also proposing that the land between Pearly Bank and Longfellow Crescent in Sholver be designated as LGS, which was a community suggestion. In relation to Hodge Clough, from an informal judgement against the LGS criteria officers do not feel that this site is considered suitable as a LGS. OPOL9 and OPOL10 fall within the Places for Everyone allocations JPA14 Broadbent Moss and JPA12 Beal Valley. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mrs Jane Millet		Cannot believe or understand why Beal Valley has been declined this status when it meets the criteria. Sets out the reasons how the site meets the criteria.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.

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	Dobcross Village Community Association	Agree that sites that have met the Local Green Space criteria should be designated as such. Wall Hill is very special to the Dobcross and wider community because of its historic significance and wildlife. It provides a quiet spot for walking sheltered by its setting from the noise from the roads in Saddleworth. OPOL 18 and 20 should be safeguarded from future development.	Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Mrs Rose Johnstone		Sholver Lane could be enhanced focussing around Meg Well and Pearly Bank which was part of the former village with farms on there. Perhaps Hodge Clough could be looked at again in view of the Beal Valley building plans. Pearly Bank has a park on there for children and a MUGA for older children to play football etc. This and Hodge Clough are the only parts of bottom Sholver which is flat and used by children and dog walkers.	Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be designated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . The Draft Local Plan is also proposing that the land between Pearly Bank and Longfellow Crescent in Sholver be designated as LGS, which was a community suggestion. In relation to Hodge Clough, from an informal judgement against the LGS criteria officers do not feel that this site is considered suitable as a LGS.
	The Stonebreaks Group	Land at Former Springhead Quarry, Cooper Street, Springhead - The background and planning history of the site is outlined, including the fact it is included within the council's SHLAA. Designating as LGS conflicts with the fact that parcels of the land are identified in the SHLAA. Additional housing is required in the Saddleworth and West ward and the LGS designation is being used in a way which is undermining sound plan making. Disagree that OPOL 13 has met the criteria for designation as LGS and sets out the reasons why.	Noted. An assessment of OPOLs has been undertaken as part of the Review Local Plan to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . A portion of the former Springhead Quarry site (Stonebreaks), not within the OPOL boundary, was previously identified within the housing land supply (as at April 2022) as it had received outline planning permission. The planning permission has now lapsed and as such the site's status has reverted to un-



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			<p>permitted. The site is not considered to be suitable for housing at this time. The wider Stonebreaks site (the OPOL) is proposed as a Local Green Space.</p>
<p>Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.</p>		<p>Welcome the review of OPOL designations as LGS. Sets out why OPOL 17 Stoneswood is suitable for residential development. Accepts that OPOL 21 Land at Summershades Lane site is of significance due to the tree cover which provides biodiversity and its historic significance. However, it is not possible to maintain the woodland properly without costly renovation work and woodland management funding. This is likely to be generated by limited housing development which will retain the majority of trees and provide planting, enable the trees to be managed and improve public access.</p>	<p>Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a>.</p>
<p>Stuart Binks</p>	<p>Rowland Homes Ltd</p>	<p>Comments are in relation to OPOL 2, Ferney Field Road, Chadderton. The submission sets out reasons as to why the site should not be redesignated as LGS and instead is suitable for around 100 larger family homes. Does not agree with the conclusions in the Local Green Space Assessment.</p>	<p>Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). This includes Ferney Field Road which is proposed for redesignation as LGS2 through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a>.</p>
<p>Mr M Coulter</p>	<p>Grasscroft Properties Ltd</p>	<p>Strongly support the conclusions which states OPOL 9 (Bullcote Lane) is not considered to be of local significance against the Local Green Space criteria. Support the council's judgement that the housing need requirements have been judged to outweigh the need to protect the land of OPOL.</p>	<p>Noted.</p>

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	Countryside Properties	Strongly support the conclusions which states OPOL 9 (Bullcote Lane) is not considered to be of local significance against the Local Green Space criteria. Support the council's judgement that the housing need requirements have been judged to outweigh the need to protect the land of OPOL.	Noted.
Denise Luke		Support the designation of sites as LGS where they have met the criteria. Stonebreaks OPOL 13 is historically and ecologically important. Plans to extend this area are welcomed.	Noted.
Mr D Goddard		Objects to OPOL 20, South of Oaklands Road being de-designated. Would like it to remain having some form of protection otherwise it will most likely lead to built development.	Noted. A review of OPOLs has been undertaken as part of the Review Local Plan to determine their suitability to be redesignated as Local Green Space (LGS). The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Mr Kevin Lawton		Concerns about the pressure to develop on the limited greenfield areas. Delighted to see that OPOL13 is proposed for LGS. The same should have happened with the original area of OPOL12. The current policy has allowed large scale development without the consequent increase in the local infrastructure. The final Local Plan also needs to have some guaranteed status so that OPOL (LGS), Tree Preservation Orders and Ancient Woodland etc cannot be overridden.	Noted. The Draft Local Plan includes Policy OL4 on Local Green Space, Policy N1 which sets out the protection for ancient woodland and Policy N3 on enhancing green infrastructure which discusses tree retention.

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Mrs Jane Barker		Ancient Woodland must be given protected status in the new local plan. Objections then provided in relation to a planning application at Knowls Lane and objections in relation to Places for Everyone / GMSF, which is separate to this consultation.	Noted. The Draft Local Plan includes Policy N1 which sets out the protection for ancient woodland. Knowls Lane is a planning application that sits outside of this Local Plan Review and Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Lisa Smirk	Save Shaw's Green Belt	There should be no pre-emptive removal of the OPOL designation of OPOL9, OPOL10 and OPOL22 which are allocated in Places for Everyone. OPOL10 (Shawside) and OPOL22 (Cowlshaw) meet the criteria for LGS so should be awarded the designation if these allocations are removed from the PFE, given that the decision not to designate them as LGS is contingent on their allocation.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). These are designated through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .
Jean Betteridge	Oldham & Saddleworth Green Party	We support the designation of OPOL sites as LGS. We oppose the loss of OPOL sites 9, 10 and 22 through allocation for development in Places for Everyone and the loss of part of the Thornley Brook OPOL to housing. OPOL 18 and 20 should be left unallocated so that they can continue to mitigate	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. An assessment of OPOLs has been undertaken as part of the Local Plan

Name	Organisation Details	Summary of Response	Council's Response
		climate change, provide habitats and green corridors for wildlife and plants, reduce air pollution, flood risk and all the other vital services of green infrastructure. The council should seek compensatory enhancement measures.	Review to determine their suitability to be redesignated as Local Green Space (LGS). These are designated through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> . The Draft Local Plan has Policy N2 Restoring Nature which deals with when compensatory enhancement measures may be appropriate.
	Trendairo Ltd	Late Submission - Support the council's proposed de-designation of OPOL 10 as this land falls within the Beal Valley strategic allocation and we agree that this area of land should be considered as part of the master planning exercise and any planning applications for this area, particularly in terms of ecology.	Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
	Natural England	Late Submission - Advise that the Accessible Natural Greenspace Standard (ANGSt) could be a useful tool to use when assessing if sites should be allocated as LGS. In relation to enhancement opportunities for LGS they should be interlinked with any strategic solutions or ecological networks. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.	An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). These are designated through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .

Name	Organisation Details	Summary of Response	Council's Response
Denise Luke		Outlines reason to preserve OPOL 13.	Noted. An assessment of OPOLs has been undertaken as part of the Local Plan Review to determine their suitability to be redesignated as Local Green Space (LGS). These are designated through Draft Local Plan Policy OL4 which sets out the approach to their protection and enhancement. The methodology and evidence for identifying LGS is set out in the <a href="#">Local Green Space Assessment</a> .

## Green Infrastructure

Table GI1: Responses submitted on the Green Infrastructure Chapter and the council's response – General Comments

Name	Organisation Details	Summary of Response	Council's Response
Mr and Mrs Briggs		Support increasing biodiversity.	Noted.
Paul Burns		The nature in our green spaces and Green Belt land must be conserved and the decline of nature halted.	Noted.
June Richards		Use brownfield land rather than greenfield. We have lovely parks but not enough green land.	Noted. There are several policies that deal with the protection of the borough's green spaces, including Policy OL4 Local Green Space, Policy N3 Enhancing Green Infrastructure through development, and Policy CO1 on the Protection of Existing Open Space.

Name	Organisation Details	Summary of Response	Council's Response
Mrs Wendy Cooper	Save Shaw Greenbelt Group	The Green Belt should take a central role in promoting biodiversity net gain regardless of whether that gain is used to offset development or not. If the gain is exported to an alternative location that has the potential to deliver a net gain greater than the mandatory 10% then that potential should be fully explored. Open space provision would be better served by pooling rather than at site level. Communities should have sizeable and accessible open spaces that could theoretically support a range of activities.	Noted. The Draft Local Plan contains Policy N2 Restoring Nature, which sets out our approach to biodiversity net gain and Policy Co1 which sets our approach to the protection of existing open spaces.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		The approach set out is welcomed. Woodland management is welcomed. Woodland planting needs to be done in accordance with a strategic landscape plan to encourage tree planting, wild meadow planting and other enhancements to the landscape. Changes to farming will also have an effect on open landscape.	Noted.
Cllr Howard Sykes	Oldham Council	Delighted to see reference to ancient woodland and wish to see the Local Plan make a commitment it. Any development which requires the destruction of Ancient Woodland should not be supported. Developments which do not meet the current policy on tree planting should not be supported and any development proposing the loss of supporting habitat for animals be required to retain it as part of the development, or, if this is demonstrated to be genuinely non-viable, to provide for its replacement on a site as close to the original as possible.	Noted. The Draft Local Plan includes Policy N1 which sets out the protection for ancient woodland and Policy N4 on Tree Replacement.
Katherine Grant		Ancient woodland must be given greater protection.	Noted. The Draft Local Plan includes Policy N1 which sets out the protection for ancient woodland.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Richard Clowes	TfGM	Late Submission - This chapter could make reference to the importance of Green Infrastructure in providing off-road and segregated active travel routes not only in providing recreational routes and access to larger areas of green infrastructure but also connecting up the built environment and existing and new communities to employment and local facilities and services.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out that developments of over 20 dwellings should enhance pedestrian and cycle connectivity between residential areas, town centres, schools and workplaces, outdoor sports, tourism and recreational facilities, public transport services and the countryside around the site, as appropriate.

Table G12: Responses submitted on the Green Infrastructure Chapter and the council's response – Green Infrastructure Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	An accredited scheme to ensure green infrastructure would add credibility, but these suggestions are not mutually exclusive. Friends of the Earth provides a Climate Action Plan for Council's which can be used to inform policy on a wide range of matters.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out in the reasoned justification a step-by-step guide as to how to integrate Green Infrastructure in new development.
Mrs Sharon Hibbert	Saddleworth Parish Council	Prefer the option of BREEAM accreditation scheme. And the Local Plan should set out a specific distance for buffers between new development and sensitive areas.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out in the reasoned justification a step-by-step guide as to how to integrate Green Infrastructure in new development.
Mrs Jane Millet		The use of a checklist to ensure green infrastructure would add credibility but given Beal Valley/ Broadbent Moss which meets the criteria and has been declined green status it would seem any comment to be useless.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out in the reasoned justification a step-by-step guide as to how to integrate Green Infrastructure in new development. Beal Valley and Broadbent Moss are strategic allocations (JPA12 and JPA14) proposed as part of Places for Everyone which is being prepared through a separate process to the review of Oldham's Local

Name	Organisation Details	Summary of Response	Council's Response
			Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Mr M Coulter	Grasscroft Properties Ltd	Supportive of a policy that seeks to maintain, enhance and maximise green infrastructure opportunities to strength the environmental quality of new developments by linking into existing landscape features, enhancing habitats and maximising the recreational offer of sites. Policies should be flexible to allow development to be assessed on a site-by-site basis to ensure the requirements are not too onerous and prevent development coming forward.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure and sets out the requirements for developments of 20 homes or more.
	Countryside Properties	Supportive of a policy that seeks to maintain, enhance and maximise green infrastructure opportunities to strength the environmental quality of new developments by linking into existing landscape features, enhancing habitats and maximising the recreational offer of sites. Policies should be flexible to allow development to be assessed on a site by site basis to ensure the requirements are not too onerous and prevent development coming forward.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure and sets out the requirements for developments of 20 homes or more.
Denise Luke		Prefer Building with Nature accreditation scheme as it appears to have the highest standards and best consultation. Buffers - There should be buffers and these should be recommended by ecological experts.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out in the reasoned justification a step-by-step guide as to how to integrate Green Infrastructure in new development. Policy N1 of the Draft Local Plan also ensures the protection of biodiversity from development and states in the reasoned justification that mitigation measures may include setting appropriate buffer zones between development plots and biodiversity, the erection of screening barriers to protect from noise and dust, measures to reduce noise or light and managing recreational pressures.



Name	Organisation Details	Summary of Response	Council's Response
Sarah Welsh	Peak District National Park Authority	There should be a buffer adjacent to the national park. The distance would depend on the scale, massing and height of development proposed. Could stipulate a minimum distance, but that it may be greater depending on the relationship with the national park. Ensure it is clear that the national park is a nature designation.	Noted. In the composite version of Places for Everyone (September 2023), Policy JP-G5 includes criteria that implements development buffers on the South Pennine Moors SAC/SPA. Places for Everyone once adopted will form part of Oldham's Local Plan. In addition, Policy N1 of the Draft Local Plan also ensures the protection of biodiversity from development and states in the reasoned justification that mitigation measures may include setting appropriate buffer zones between development plots and biodiversity, the erection of screening barriers to protect from noise and dust, measures to reduce noise or light and managing recreational pressures.
	Russell LDP	Supports the use of BREEAM as an effective method of environmental Assessment. The achievement of 'very good' on the BREEAM scale is acceptable. In terms of buffers between new development and sensitive areas advice would be required from landscaping specialists and it should be dealt with on a site-by-site basis in the context of the sensitivity of the sites.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out in the reasoned justification a step-by-step guide as to how to integrate Green Infrastructure in new development. Policy N1 on protecting nature states in the reasoned justification that mitigation measures may include setting appropriate buffer zones between development plots and biodiversity, the erection of screening barriers to protect from noise and dust, measures to reduce noise or light and managing recreational pressures.
Darryl Nolan		Growing communities need more not less open spaces but building on green spaces reduces the amount of open space available.	Noted.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Green Infrastructure Broadbent Moss will incorporate opportunities for green infrastructure and open space in line with the local need and requirements.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Supportive of the incorporation of clear standards for the construction of new buildings. In accordance with our comments regarding water efficiency, there should be clear standards for water efficiency in new commercial buildings. Welcome the opportunity to work with the council to consider how this can be achieved and would encourage the council to set an ambitious BREEAM requirement.	Noted. The Draft Local Plan includes Policy CC5 which outlines our approach to water efficiency, including for non-residential buildings and incorporates the BREEAM standards.
Sylvia Whittingham	Environment Agency	Late Submission - Highlight that waterbodies in the borough are identified as heavily modified, in large part due the large industrial legacy of area and previous built encroachment along many waterbodies. There are still major environmental improvements needed to enhance the functioning and ecological quality of majority of Greater Manchester river corridors. It would be recommended that above ground SUDs options are considered preferentially where ever feasible for new development.	Noted. Draft Plan Policy CC4 on Sustainable Drainage – Foul and Surface Water sets out our approach to SUDS.

Table G13: Responses submitted on the Green Infrastructure Chapter and the council's response – Biodiversity Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	Important that biodiversity gain should be delivered as close to the development site as feasibly possible. The Green Belt should take a central role in promoting biodiversity net gain regardless of whether that gain is used to offset development or not. But in cases where the Green Belt is in close proximity then	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification

Name	Organisation Details	Summary of Response	Council's Response
		the opportunity to kill two birds with one stone should be taken. If the net gain is exported to an alternative location that has the potential to deliver a net gain greater than 10% then that potential should be fully explored.	further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.
Kevin Hatherill		Biodiversity should be encouraged everywhere, green spaces should be protected and created in urban areas. Innovative methods should be used in urban areas. The net gain in the creation of green spaces should be higher than the minimum proposed 10%.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain where the requirement has been set at 10%. In addition, there are several other policies that encourage biodiversity including Policy CC4 on sustainable drainage that encourages green roofs and N3 regarding the enhancement of green infrastructure through development.
Joanne Harding	Home Builders Federation Ltd	Do not consider that there are instances where it would be appropriate to introduce a higher biodiversity net gain requirement. The 10% requirement will be appropriate and consistent to the industry.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain where the requirement has been set at 10%.
Mrs Sharon Hibbert	Saddleworth Parish Council	Important that biodiversity gain should be delivered as close to the development site as feasibly possible. Would support net gain being delivered in all four projects listed. There are instances where a higher than the minimum 10% biodiversity net gain should be applied to developments.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.
Mrs Jane Millet		Very important that biodiversity gain should be delivered as close to the development site as feasibly possible.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only

Name	Organisation Details	Summary of Response	Council's Response
			when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.
Mr RAAD RAAD AL-HAMDANI		The lack of attention that has been shown to the protection of ancient woodlands must be reversed. Not only is that necessary to maintain biodiversity, but because of the inherent local characteristics that would be difficult to emulate through new green areas being created. Net gain being sought elsewhere is a good second choice but not at the expense of destroying such green spaces because of the desirability of developing the location and to maximise profit.	Noted. The Draft Local Plan includes Policy N1 which sets out the protection for ancient woodland. Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.
Sarah Welsh	Peak District National Park Authority	There is no reference to the national park as a whole in paragraph 19.16.	Noted. There is Policy OL1 in the Draft Local Plan on the Consideration for the Peak District National Park and other references throughout the draft plan.
Denise Luke		Off-site BNG should be in the immediate locality and it is very important to ensure mitigation is enforced. BNG should be directed to local projects - the development shouldn't be allowed if the habitat is to be destroyed. It's difficult to relocate / re-establish natural habitats. All development should aim for at least a 10% gain and any close to or impinging on existing open spaces should have to enhance biodiversity further.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site

Name	Organisation Details	Summary of Response	Council's Response
			net gain to be delivered within Oldham close to where developments may be taking place.
	Russell LDP	Committed to providing full biodiversity net gain on-site where possible. Sets out some specifics regarding the Stakehill allocation in PfE in relation to net gain. PfE maintains that developments should attain a minimum of 10% biodiversity net Gain. The Local Plan should remain consistent with the policies outlined within the wider regional plan and should not duplicate or contain conflicting policies.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain. In relation to the Stakehill strategic allocation (JPA2) Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Jean Betteridge	Oldham & Saddleworth Green Party	Prevention of habitat destruction is essential. Offsetting is a very last resort. Very important that the money is spent locally. The priority must be to prevent destruction of the right kind of habitat. If in exceptional circumstances this is not possible we support net gain elsewhere in the borough. There should be provision for going over the 10% depending on the specific effects of the development on the environmental situation in the local area.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. The proposals for Broadbent Moss will consider the requirement to retain, protect and enhance areas of biodiversity as well as other landscape features and woodland. Support the council's ambitious targets for biodiversity outcomes; however, these must be balanced against other priorities and viability.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.

Name	Organisation Details	Summary of Response	Council's Response
Joel Owen	First Choice Homes	FCHO is committed to enhancing biodiversity but each site must be considered on its own individual merits. The mechanism of how this is managed should be considered, with our preference for it to be conditioned as part of the planning process rather than through a Section 106 agreement.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Given the land owned by UU in the Oldham, we would welcome the opportunity to further discuss the approach to biodiversity net gain, tree planting and any opportunities that may exist.	Noted.
Sylvia Whittingham	Environment Agency	Late Submission - Policies need to adhere with NPPF. Welcome Northern Roots. Welcome the proposals to achieve net gain in biodiversity, air quality and water quality. Recommend any green infrastructure network operate on catchment wide basis, linking with neighbouring boroughs to create a multifunctional and interconnected green-infrastructure network.	Noted.
Sylvia Whittingham	Environment Agency	Late Submission - At present the current ecological potential of waterbodies are failing their statutory environmental objectives. Welcome opportunity to create a high-quality riparian network, that aims to meet principles outlined in Rivers by Design guidance document. Compensation should be provided as close as possible to the location where effects have occurred and benefit the same habitats and species as those affected. In regard to BNG it is recommend if net gain cannot be accommodated on site that it be achieved preferentially in the locally area and that it be commensurate to the habitats types and scale of impacts any proposed scheme has.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, this includes setting out that only when a development is unable to deliver a net gain of at least 10% on the development site that it may be delivered off-site. The reasoned justification further explains that the council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place.

Name	Organisation Details	Summary of Response	Council's Response
	Natural England	Late Submission - May wish to align any biodiversity polices with the proposed changes to the Environment Bill. Support the outcome of higher than a 10% minimum of net gain for developments. Advocate the use of the Defra Metric to calculate any potential biodiversity losses and compensation to be measured.	Noted. The Draft Local Plan includes Policy N2 on restoring nature that sets out our response to biodiversity gain, including reference to the Defra Metric.

Table GI4: Responses submitted on the Green Infrastructure Chapter and the council's response – Residential Gardens Question

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Oldham should restrict the paving over of front gardens for all new residential developments.	Noted. Policies N2 and N3 in the Draft Local ensure the protection and enhancement of the borough's GI network, which includes residential gardens.
Denise Luke		Support requirements for garden / amenity space and support restricting redevelopment of gardens for homes.	Noted. Policies N2 and N3 in the Draft Local ensure the protection and enhancement of the borough's GI network, which includes residential gardens. On balance it was not considered appropriate to apply a minimum standard for garden / amenity space. However, Draft Plan Policy D1 does set out the requirement that residential developments need to include a proportionate amount of outside amenity space for both occupiers and visitors.

Name	Organisation Details	Summary of Response	Council's Response
Joel Owen	First Choice Homes	Do not support the restriction of paving front gardens, as often these areas reduce the on-street parking which benefits security, reduced antisocial behaviour and crime as long as customers have access to rear gardens. The focus should be on setting minimum garden requirements on new build private or communal schemes that enable and promote health and wellbeing.	Noted.
Jean Betteridge	Oldham & Saddleworth Green Party	Agree with restricting the paving of gardens, ensuring residential developments provide enough garden space and restricting the redevelopment of garden land for new homes.	Noted.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Highlight that the paving over of front gardens is a significant contributor to the impact of flood risk. The gradual paving over of front gardens and the subsequent connection of drainage systems to the public sewer is not sustainable and gradually erodes the capacity of the public sewer system. Strongly supportive of any policy that restricts the paving over of gardens and ensures appropriate control mechanisms. Also supportive of a minimum standard for garden / amenity space. Consideration of amenity space around dwellings should be linked to the strategy for managing surface water.	Noted. Policies N2 and N3 in the Draft Local ensure the protection and enhancement of the borough's GI network, which includes residential gardens. On balance it was not considered appropriate to apply a minimum standard for garden / amenity space. However, Draft Plan Policy D1 does set out the requirement that residential developments need to include a proportionate amount of outside amenity space for both occupiers and visitors.



Table G15: Responses submitted on the Green Infrastructure Chapter and council's response – Open Space Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	Open space provision would be better served by pooling rather than at site level. Communities should have sizeable and accessible open spaces that could theoretically support a range of activities. The form that these sites should take would depend on proximity to other open spaces, parks etc, and determined through consultation with the community the spaces would serve.	Noted. Draft Local Plan Policy CO2 on new and enhanced open spaces sets out the approach to open space provision as part of new developments and Policy CO3 outlines how the council will determine that the provision is fit for person for the location. Policy IN2 on planning obligations sets out circumstances in which it may be appropriate for s106 monies to be pooled.
Kevin Hatherill		Support the pooling at community rather than site level, to create sizeable green spaces which can provide a larger green environment.	Noted. Draft Local Plan Policy IN2 on planning obligations sets out circumstances in which it may be appropriate for s106 monies to be pooled
Mrs Sharon Hibbert	Saddleworth Parish Council	All new major housing developments should contribute to open space provision on site. The Local Plan can ensure access to the wider countryside is enhanced by the providing footpaths, the provision of adequate car parking facilities, provision of public transport with park and ride facilities. Provision of adequate refuse bins with frequent and regular collection of refuse. New developments should have communal open space areas for relaxation and children's play.	Noted. Draft Local Plan Policy CO2 on new and enhanced open spaces sets out the approach to open space provision as part of new developments and Policy CO3 outlines how the council will determine that the purpose is fit for person for the location. Policy D1 sets out a design-led approach for residential and residential-led mixed-use development, considering matters such as encouraging and facilitating active travel with convenient, safe and inclusive pedestrian and cycling routes and the incorporation of appropriate communal outside amenity spaces.
Mrs Jane Millet		Beal Valley is local open space open to many residents yet you plan to build on it.	Noted. JPA12 Beal Valley is a strategic allocation proposed in Places for Everyone, which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-">https://www.greatermanchester-ca.gov.uk/what-we-</a>

Name	Organisation Details	Summary of Response	Council's Response
			<a href="#">do/planning-and-housing/places-for-everyone/</a> for further information.
Sarah Welsh	Peak District National Park Authority	Reference the national park in enhancing access to the wider countryside.	Noted. There is Policy OL1 in the Draft Local Plan on the Consideration for the Peak District National Park and other references throughout the draft plan.
Sport England	Sport England	In line with NPPF we advocate that at the core of planning for sport should be a robust and up-to-date assessment of the needs for sport and recreational facilities as well as opportunities for new provision. The results of the assessment should be developed into a clear strategy. Sport England consider local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types.	Noted. A Playing Pitch Strategy is being developed and will be used to inform this policy as appropriate at Publication Plan stage.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Will endeavour to incorporate opportunities for open space for the Broadbent Moss allocation in line with future need, including provision for children's play and informal recreation.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Joel Owen	First Choice Homes	Recommend that decisions in respect of on and/or off-site open space provision is based upon evidenced need, such as the council's Open Space Strategy.	Noted. Draft Local Plan Policy CO2 on new and enhanced open spaces sets out the approach to open space provision as part of new developments and Policy CO3 outlines how the council will determine that the provision is fit for purpose for the location. These policies have been informed by the council's Open Space Strategy.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	All new major housing developments will contribute to open space provision in the form of onsite provision in the first instance. The type of open space provided for local areas depends on what is currently lacking in the area. To ensure access to open countryside public information in a wide range of formats and public transport provision is needed. The Local Plan must also recognise the need to protect and provide green spaces in the borough's built-up areas. Sites should be allocated for new open spaces.	Noted. Draft Local Plan Policy CO2 on new and enhanced open spaces sets out the approach to open space provision as part of new developments and Policy CO3 outlines how the council will determine that the provision is fit for purpose for the location.

Table GI6: Responses submitted on the Green Infrastructure Chapter and the council's response – Food Growing / Community Garden Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	New housing developments over a certain threshold should provide space for food growing. Provision of allotments for food growing to enhance well-being and good mental health. Unable to identify suitable sites at the moment.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out that developments of over 20 homes should provide for the production of food (e.g. allotments and community gardens) within residential or mixed use developments, where possible. Allotments are also covered in the policies on open space, CO1 – CO3.
Ms Deborah Wroe		New housing developments should provide space for food growing and sites should be set aside for food growing and not just on a community basis - more allotments should be allocated	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out that developments of over 20 homes should provide for the production of food (e.g. allotments and community gardens) within residential or mixed use

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
			developments, where possible. Allotments are also covered in the policies on open space, CO1 – CO3.
Sarah Welsh	Peak District National Park Authority	Allotments are designated spaces, this is not clear or referenced in this section.	Noted.
Denise Luke		Support food growing in new developments and sites should be set aside.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out that developments of over 20 homes should provide for the production of food (e.g. allotments and community gardens) within residential or mixed use developments, where possible. Allotments are also covered in the policies on open space, CO1 – CO3.
Jean Betteridge	Oldham & Saddleworth Green Party	Should provide space for food growing. The orchard and growing areas on the former Grassroots day centre site in Failsworth between Marlborough Drive and the Rochdale Canal could be set aside for food growing.	Noted. The Draft Local Plan includes Policy N3 on enhancing Green Infrastructure which sets out that developments of over 20 homes should provide for the production of food (e.g. allotments and community gardens) within residential or mixed use developments, where possible. Allotments are also covered in the policies on open space, CO1 – CO3.

Table GI7: Responses submitted on the Green Infrastructure Chapter and the council's response – Protection of Trees Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt	There should be a policy regarding trees as a carbon sink and ensure there is a net gain on an annual basis. Ancient woodland should also not be harmed.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.

Name	Organisation Details	Summary of Response	Council's Response
	Community Group		
Mrs Sharon Hibbert	Saddleworth Parish Council	There most definitely should be a policy protecting trees, together with strict and total enforcement by the local authority and respect by developers and the public.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Mrs Wendy Cooper	Save Shaw Greenbelt Group	There should be a policy protecting trees.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Mrs Jane Millet		There should be a policy protecting trees.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
	Dobcross Village Community Association	There should be a policy protecting trees.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		A policy on tree protection is still required, but it needs to be reviewed. Existing trees on or near potential sits need to be assessed for their individual and group quality but the retention of all or some of the tree needs to be balanced against the need for development. Decisions should be made on an individual site basis, rather than a blanket approach.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Denise Luke		Should have protection of trees policy and enforce it.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Sarah Welsh	Peak District National Park Authority	Recommend more context. Trees are protected in Conservation Areas or through TPOs but this isn't enforced.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Katherine Grant		Tree preservation orders must be considered and instated.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
Jean Betteridge	Oldham & Saddleworth Green Party	Given their key role in combating climate change, providing habitats and reducing air pollution there should be a policy protecting trees.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.
	Natural England	Late Submission - May wish to update and expand on this policy for this Local Plan to include the restoration of trees, as well as protection and you may wish to link policy to on-going strategies such as City of Trees.	Noted. The Draft Local Plan Policy N4 on tree replacement outlines the approach to the protection and replacement of trees.

## The Built Environment

Table BE1: Responses submitted to the Built Environment Chapter and the council's response – General comments

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Denise Luke		Concern that Conservation Area boundaries and restrictions are not respected by residents or OMBC officers.	Noted. There are policies in the Draft Local Plan that outline our approach to conservation areas, Policy OTC2 on Oldham Town Centres conservation area and Policy HE3 on development proposals affecting conservation areas.

Table BE2: Responses submitted on the Built Environment Chapter and the council's response – Historic Environment Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	Oldham Town Centre conservation area should not be extended.	Noted. The <a href="#">Oldham Town Centre conservation area Appraisal and Management Plan Supplementary Planning Document (SPD)</a> was prepared to address the issues facing the at-risk conservation area and sets out a positive approach to enable the conservation area to be enhanced and its eventual removal from the at-risk register. The appraisal proposed four extensions to the existing Oldham Town Centre conservation area boundary. The extensions have been designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and will adopted as part of the Local Plan.
	Historic England	Agree that Oldham Town Centre conservation area be extended. The issues identified in paragraphs 20.1 to 20.16 present the issues relevant to the historic environment for Oldham. Two important areas specific to Oldham are the future use of textile mills and seeking to enhance Oldham Town Centre Conservation Area with the aim of removing it from the 'at risk' register.	Noted.
Mrs Sharon Hibbert	Saddleworth Parish Council	Agree that Oldham Town Centre conservation area be extended. The Local Plan should also address maintenance of accurate details of heritage assets together with asset condition monitoring and	Noted. Within the Historic Environment chapter the Draft Local Plan sets out several local heritage policies in HE1 – HE5.

Name	Organisation Details	Summary of Response	Council's Response
		maintenance as required. There should be localised heritage policies.	
Mr RAAD RAAD AL- HAMDANI		Agree with the extension of the conservation area. There should be designated funds and the ability to ensure compliance.	Noted. The <a href="#">Oldham Town Centre conservation area Appraisal and Management Plan Supplementary Planning Document (SPD)</a> was prepared to address the issues facing the at-risk conservation area and sets out a positive approach to enable the conservation area to be enhanced and its eventual removal from the at-risk register. The appraisal proposed four extensions to the existing Oldham Town Centre conservation area boundary. The extensions have been designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and will adopted as part of the Local Plan.
Denise Luke		Support extended Oldham Town Centre conservation area boundaries being adopted on proposals map. Support for residents of conservation areas to enhance them (e.g. Stonebreaks). Support localised heritage policies.	Noted. Within the Historic Environment chapter the Draft Local Plan sets out several local heritage policies in HE1 – HE5.
Jean Betteridge	Oldham & Saddleworth Green Party	The extensions to the conservation area should be incorporated. In relation to other areas, Green Infrastructure, the Natural Environment and Open Land are part of our local heritage because they have been shaped by human activity and in turn shape the historic connection of generations to where they live and like the historic built environment contribute to quality of life. There should be localised heritage policies.	Noted. Within the Historic Environment chapter the Draft Local Plan sets out several local heritage policies in HE1 – HE5.



<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
	Historic England	In relation to the Spatial Portrait, more value could be added regarding a brief narrative on the evolution of the borough's historic environment and the growth of the town during the 19th century. This will help provide a strong context.	Noted. The Historic Environment section of the Draft Local Plan includes a lot of context regarding the evolution of the borough's historic environment. It is felt this is the appropriate location.
	Historic England	The council has taken a positive approach to the historic environment in recent years.	Noted.

Table BE3: Responses submitted on the Built Environment Chapter and the council's response – Mills Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	Oppose a localised conservation strategy for mills. These mills generally do not contribute to the local character in a positive way. If a mill carries notable historical or architectural value then it should be listed. Oldham should focus its conservation strategy on preserving listed mills that are of genuine historical interest. Unlisted mills that are not still in use in some capacity should either be converted into apartments or razed to the ground to make way for housing or business premises, depending on the suitability of location.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair. Several mills already form part of our Housing Land Supply, while others serve an important employment purpose.
June Richards		Many mills could be converted to flats and maisonettes. Would like one mill restored as a museum as an educational resource and to give pride.	Noted.

Name	Organisation Details	Summary of Response	Council's Response
	Historic England	Mills are fundamental to the character of Oldham. A policy approach which seeks to retain those mills which are significant either as designated or non-designated heritage assets either individually or as part of a cluster of important mills is an important issue. We will continue to work with the council in identifying an appropriate local plan policy which is consistent with national policy. We generally support an approach which seeks to conserve mill stock in a manner appropriate to their significance, a mechanism for this which categorises mill buildings in order of priority supported by a robust evidence base we believe can be justified.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair.
Kevin Hatherill		Conserving a small number of mills (e.g. 5) would allow future generations to see Oldham's heritage, but having so many mills is unsightly, unproductive space, not cost effective to maintain, and the space could be better used as the local economy and needs of the local community have changed significantly since the mills were built. It would be better to use this land for new homes and enterprises, in urban areas, close to amenities. The mill sites are perfect locations for redevelopment, either new development or the renovation of some mills.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair. Several mills already form part of our Housing Land Supply, while others serve an important employment purpose.
Mrs Sharon Hibbert	Saddleworth Parish Council	Agree with the policy approach to high, medium and low priority mills and mill clusters and do not have an alternative.	Noted.
Ms Deborah Wroe		Empty mills are a waste of space - they should be retained for commercial or domestic use where possible and knocked down for housing or commercial use where not.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the

Name	Organisation Details	Summary of Response	Council's Response
			approach to our un-designated mills to establish a positive future for their reuse and repair. Several mills already form part of our Housing Land Supply, while others serve an important employment purpose.
Mrs Wendy Cooper	Save Shaw Greenbelt Group	Do not agree with the policy approach to high, medium and low priority mills and mill clusters. A national heritage scheme already exists and a localised conservation strategy for mills does not appear to be consistent with the GMSF's "brownfield first" policy. Unlisted mills that are not still in use in some capacity should either be converted into apartments or razed to the ground to make way for housing or business premises, depending on the suitability of location.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair. Several mills already form part of our Housing Land Supply, while others serve an important employment purpose.
Denise Luke		Support mills policy approach.	Noted.
Brian Beedham		All vacant property must be converted into housing stock before building on virgin land.	Noted.
Joel OWEN	First Choice Homes	The current approach is too generic with an overall presumption in favour to conserve rather than redevelop. Mill sites that do not contribute to the historic and cultural context of Oldham should be in favour of being redeveloped.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair.
Lisa Smirk	Save Shaw's Green Belt	A national heritage scheme already exists and a localised conservation strategy for mills does not appear to be consistent with the GMSF's "brownfield first" policy. Unlisted mills that are not in use should either be converted into apartments or razed to the ground to make way for housing or business premises, depending on the suitability of location.	Noted. Following completion of the Oldham Mills Strategy, and to comply with national planning policy, it was felt appropriate to include a policy in the Draft Local Plan on our mills. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair. Several mills already form part of our Housing Land Supply, while others serve an important employment purpose.

Name	Organisation Details	Summary of Response	Council's Response
Jean Betteridge	Oldham & Saddleworth Green Party	Welcome the mills strategy and action to repurpose mills before empty building decay leads to demolition of a key part of our borough's landscape. Agree to the policy approach outlined in the document in relation to the mill clusters.	Noted.
Darryl Nolan		Use brown sites first and see that any unused mills are developed before taking green space.	Noted.
	Trendairo Ltd	Late Submission - Since the Mill Strategy has been drafted, there has been a significant change in circumstances regarding the grouping Duke Mill is within. Approval has been granted for the demolition of two of the three mills within this grouping would leave only our client's mill in isolation, significantly reducing its significance as a non-designated heritage asset. When considered in isolation, Duke Mill is considered to fall within the 'Low Priority' grouping of mills and should be considered suitable for comprehensive redevelopment. It is requested that the draft Mill Strategy be updated ahead of adoption.	Noted. It is acknowledged that permission has been granted for the demolition of a number of mills within Cluster 1 (comprising Elm Mill, Lily Mill, Briar Mill, Lilac Mill and Duke Mill) as identified in Draft Local Plan Policy HE4 Oldham's Mills and the latest position regarding this will be reflected at Publication Plan stage.
Sylvia Whittingham	Environment Agency	Late Submission - Many mills relied on and were associated with rivers, it is recommended as part of any mills policy that the potential negative environmental impacts in regards to green infrastructure functioning, biodiversity and flood risk etc. are factored in any prioritisation exercise for retaining or regenerating these sites.	Noted. Policy HE4 sets out the approach to our un-designated mills to establish a positive future for their reuse and repair, including the retention of those elements of the mill stock which contribute to the local identity and sense of place of Oldham and ensure they are appropriately conserved in a manner appropriate to their significance.

Table BE4: Responses submitted on the Built Environment Chapter and the council's response– Local Design Code and Design Questions

Name	Organisation Details	Summary of Response	Council's Response
Joanne Harding	Home Builders Federation Ltd	If detailed design policies are introduced the council should consider the viability of proposals and how they would sit alongside other requirements. Supportive of the use of Design Review Panel. It will be important that the council sets the threshold at an appropriate level of development. Supportive of Design Codes and the benefits of a developer preparing or contributing to the production of a Code though it is important that the threshold is set at the right level and that a level of flexibility is introduced. Supportive of Building for a Healthy Life, however, it is not considered appropriate to specify a target such as ensuring 12 greens for all new residential development. It is intended to be used as a design process structure not a scoring system.	Noted. There are several policies relating to design within the Built Environment chapter. Policy D3 on design scrutiny sets out the circumstances in which review panels should be used and the importance of the Design Review Panel is set out in the reasoned justification. The policy also sets out the approach in relation to the Building for a Healthy Life tool in that developments for 10 or more homes should be using the tool. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham chapter.
	Historic England	Welcome the preparation of a Local Design Code which helps conserve and enhance heritage assets. Link to case studies sent.	Noted.
Mrs Sharon Hibbert	Saddleworth Parish Council	The council prioritise the production a Local Design Code. Special characteristics will be addressed for Saddleworth in the Parish Council's plan. Building design, quality and materials must be innkeeping with traditional community styles. Policies on distances between habitable spaces, bin storage, bicycle storage, provision of electric vehicle charging points, two car parking spaces per household, community allotments, community halls, green energy provision, fibre broad band installations are sought. A general	Noted. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the Creating a Better and Beautiful Oldham chapter. Policies D1 and D2 in the Draft Local Plan sets out several design

Name	Organisation Details	Summary of Response	Council's Response
		design policy should include inclusive design. The threshold for a Design Review should be 20 homes plus and the threshold for design codes should be 50 homes plus. The council should use the Building for Healthy Life'.	requirements that development for residential and non-residential proposals should provide including waste storage and separation distances. Policy T4 considered electric vehicle charging points and Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan.
Mr RAAD RAAD AL-HAMDANI		If housing is being envisaged then consideration of its effects on all aspects of the environment should form part of its assessment, not just the visual impact, which is the primary purpose of a design code. It would be better if that was integrated into the environmental impact assessment and be set at the same level as that applies at present. Design reviews are good but are subjective in that those undertaking them are not local. Far better to ensure fit that local involvement in the form of open days and scheme presentations that form part of the processing of applications are introduced.	Noted.
Mr M Coulter	Grasscroft Properties Ltd	Supportive of a policy that provides guidance in respect of good quality design. Policies should be flexible and in keeping with the local design. Residential developments of a large scale should not be subject to overly prescriptive and onus design codes as this can create barriers for large scale development opportunities. With regard to setting targets, for example the Building for a Health Life criteria, policy wording needs to be flexible to allow for lower targets where it can be justified on a site-specific basis.	Noted. There are several policies relating to design within the Built Environment chapter. Policy D3 in the Draft Local Plan on design scrutiny sets out the approach in relation to the Building for a Healthy Life tool in that developments for 10 or more homes should be using the tool. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set

Name	Organisation Details	Summary of Response	Council's Response
			out within the policies within the Creating a Better and Beautiful Oldham section.
Cllr Howard Sykes	Oldham Council	Local Plan to commit to ensuring that the occupants of any new residential properties enjoy access to natural light and rooms complying with the government's minimum required space standard.	Noted. Policy D1 in the Draft Local Plan sets out that the layout, orientation and design of new homes should provide adequate daylight for residents. Whilst, Places for Everyone policy JP-H3 sets out that all new homes must comply with the nationally described space standards. Once adopted Places for Everyone will form part of Oldham's Local Plan.
	Countryside Properties	Supportive of a policy that provides guidance in respect to good quality design. Policies should be flexible in regard to keeping with the local design. Residential developments of a large scale should not be subject to overly prescriptive and onus design codes as this can create barriers for large scale development opportunities. With regard to setting targets, for example the Building for a Health Life criteria, policy wording needs to be flexible to allow for lower targets where it can be justified on a site-specific basis.	Noted. The policies within the Creating a Better and Beautiful Oldham section outline the approach to design. Policy D3 on design scrutiny sets out the approach in relation to the Building for a Healthy Life tool in that developments for 10 or more homes should be using the tool. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham chapter.
Denise Luke		Support production of a Design Code. The special characteristics of Springhead are Green space, vernacular architecture, stone construction with tradition methods. Design of development should blend with the historical and existing landscape and	Noted. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the

Name	Organisation Details	Summary of Response	Council's Response
		enhances the local area. Would like to see detailed design policies on residential design specifying distances between habitable space and minimum % of green space versus hard landscaping, bin and bike storage, electric vehicle charging points, sufficient parking spaces per household, priority of people over vehicles, play spaces for children, community shared space. Inclusivity should be integral to all designs. Submission of design code for residential developments with a threshold of 100 homes. Design reviews should be required. Support Building for a Healthy Life.	Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham chapter. Policy D3 on design scrutiny sets out the importance of the Design Review Panel in the reasoned justification and the policy sets out the approach in relation to the Building for a Healthy Life tool in that developments for 10 or more homes should be using the tool.
	Kellen Homes	Appreciate the need to set out policies which reflect the distinctiveness of local communities. Policies should be flexible with regards to being in keeping with the local design. A Local Design Code will be a useful starting point however the level of detail required to be complied with should not add another barrier to the decision-making process. Supports the approach to produce housing developments that reflect the local character; however, policies should be flexible. Residential developments should not be susceptible to prescriptive design codes as this can create barriers for development to come forward.	Noted. The policies within the Creating a Better and Beautiful Oldham section outline the approach to design. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham section.
	Russell LDP	Supports the production of a Local Design Code. Would like to the inclusion of employment site design within a Potential Design Code as many publications centre on guidelines for residential developments, but industrial and commercial guidelines remain more ambiguous and inconclusive. Interested in detailed design policies regarding specific parking standards parameters, requirements for electric vehicle charging points and landscaping. However, each site should be	Noted. Draft Local Plan Policy D2 sets out the design approach for non-residential, commercial and employment developments. Policy T3 sets out car parking standards and T4 the approach to electric vehicle charging points. Policy D3 on design scrutiny sets out the circumstances in which review panels should be used and the importance of the Design Review Panel is set out in the reasoned justification.



Name	Organisation Details	Summary of Response	Council's Response
		considered on its own merits. Detailed design policies should not hinder the potential for development delivery so sufficient flexibility should be considered. Supportive of a general design policy and determine 'inclusive' design as an aspect of a broader policy guideline. Does not support applications over a certain threshold to be the subject of a Design Review. The Design Review process should remain voluntary and discussed through the formal pre-application process.	
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		The principles set out in the national Design Guide need to be addressed in drawing up design policies. Design policies should be given a high profile in the Local Plan, but they must be workable and not stifle imaginative and high-quality design. Support the use of a Design Review Panel.	Noted. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham section. Policy D3 on design scrutiny sets out the circumstances in which review panels should be used and the importance of the Design Review Panel is set out in the reasoned justification
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Support the use of Local Design Codes to reflect local distinctiveness in the design of the Broadbent Moss allocation.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Joel Owen	First Choice Homes	In favour of an Oldham Design Code to promote a minimum standard in quality and design that reflects the historic but also the future direction of the borough. The Oldham code should be prescriptive on standards around sustainability and sizes. Size	Noted. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the

Name	Organisation Details	Summary of Response	Council's Response
		standards should be aligned to Nationally Described Space Standards. The Oldham Design Code should set out standards in relation to sustainability such as car charging points, but also set out clear guidance in relation to bike and bin storage and follow the Building for Healthy Life guidance.	Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham section.
Jean Betteridge	Oldham & Saddleworth Green Party	Support production of a local Design Code. An inclusive design code is essential and needs major input from people who are being excluded by the design of buildings and places for it to be effective.	Noted. In line with national planning policy the council is committed to preparing The Oldham Code, which will be an innovative approach to delivering a borough-wide Design Code and Placemaking Guide. Once in place The Oldham Code will sit alongside the Local Plan to provide a local framework for design and clarity regarding what is expected in relation to the design-led approach set out within the policies within the Creating a Better and Beautiful Oldham section. When in preparation the Oldham Code will be subject to public consultation.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Any Local Design Code should fully address sustainable drainage and water efficiency. Recommended policy wording suggested. Supportive of a Local Design Code and would encourage a design code that gives specific focus to climate change resilience via the incorporation of water efficiency measures and sustainable drainage which is integrated with landscape design and multi-functional. A design code should emphasise the importance of carefully considering ground levels and finished floor levels so that any residual flood risk is most appropriately managed.	Noted. The Draft Local Plan has policies CC3 and CC4 that outline our approach to surface water and water efficiency. The scope of The Oldham Code is still to be agreed but sustainable drainage and water efficiency will be considered.

## Transport and Improving Connectivity

Table TIC1: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – General

Full Name	Organisation Details	Summary of Response	Council's Response
	Network Rail	Network Rail welcome the inclusion in the Local Plan and support for proposed railway developments at Standedge Tunnel and Diggle. As part of the mainline railway's contribution to becoming carbon neutral, we are promoting electrification of the railway line through Saddleworth and feel this could also warrant inclusion in section 17.	Noted. The Draft Local Plan includes Policy T1 Delivering Oldham's Transport Priorities which makes reference to Standedge Tunnels and Diggle Station.
Mr and Mrs Briggs		Support improving bus services, in terms of reliability, costs and information screens at each stop.	Noted.
Mr M Coulter	Grasscroft Properties Ltd	It is appropriate to encourage sustainable modes of transport, however, it is not appropriate for new housing developments to be required to provide a public transport pass. Sustainable transport modes should be encouraged in a flexible policy, allowing developers to choose the most appropriate approach for their development.	Noted. The Draft Local Plan does not include a requirement for new housing to provide a public transport pass.
	Countryside Properties	It is appropriate to encourage sustainable modes of transport, however, it is not appropriate for new housing developments to be required to provide a public transport pass. Sustainable transport modes should be encouraged in a flexible policy, allowing developers to choose the most appropriate approach for their development.	Noted. The Draft Local Plan does not include a requirement for new housing to provide a public transport pass.

Full Name	Organisation Details	Summary of Response	Council's Response
	Russell LDP	Supports minimum parking standards.	Noted. Draft Local Plan Policy T3 sets out the car parking standards which are maximum vehicle parking standards and minimum cycle parking for new developments, with different standards depending on the location and type of development.
Sarah Welsh	Peak District National Park Authority	Includes good suggestions to improve transport and connectivity. It is important that thought is given to onward connectivity into the PDNP. There is an overreliance on the private car to access the PDNP from within Oldham e.g. Dove Stone Reservoir. In planning access to services for the residents of Oldham, the value of green space cannot be ignored. Many issues within the Transport and connectivity chapter relate to improving options for active travel and public transport. Connectivity to that part of Oldham that lies within the National Park should also be considered. At Dove Stone reservoir, the parking facilities are limited and options for connectivity are within the gift of the Oldham Local Plan rather than the PDNP.	Noted.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Difficult to strike balance between highway safety and well-designed places, a degree of flexibility is needed. In parts of Oldham, particularly the Pennine areas, fixed highway gradient standards can be a problem that restricts development density and housing layouts. A steeper gradient should be accepted on certain development sites where layout and development would benefit.	Noted.

Full Name	Organisation Details	Summary of Response	Council's Response
Jean Betteridge	Oldham & Saddleworth Green Party	Support the continued safeguarding of land for the re-opening of the remaining Standedge Tunnels, the development of track between Diggle and Marsden and the proposed Diggle rail station. We welcome the provision of the Shaw and Crompton park and Ride We welcome a review of the extension of Lees New Rd.	Noted. The Draft Local Plan includes Policy T1 Delivering Oldham's Transport Priorities which makes reference to Standedge Tunnels and Diggle Station.
Richard Clowes	TfGM	Late Submission - There are no proposals or suggested policies to support future development of the Rapid Transit network or Quality Bus Transit within Oldham. Section. 21.31 has a few things that are relevant, this could be expanded to cover potential future rail, Metrolink and Bus Rapid Transit schemes and QBT.	Noted. Noted. The Draft Local Plan includes Policy T1 Delivering Oldham's Transport Priorities which makes reference to future Quality Bus Transit and Metrolink expansion.
Denise Luke		Lack of residential parking and access to charging points.	Noted. Draft Local Plan Policy T3 sets out our approach to car parking standards and Policy T4 on the provision of electric vehicle charging points.

Table TIC2: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – Transport Accessibility Questions

Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Parking standards should be tailored based on the application and area.	Noted. Draft Local Plan Policy T3 sets out the car parking standards which are maximum vehicle parking standards and minimum cycle parking for new developments, with different standards depending on the location and type of development.
Mrs Jane Millet		Oldham's parking charges seem to be the most expensive in the area when there is not much to offer in the town. Perhaps reconsideration of charges is needed. Can travel to the Trafford Centre and park for free.	Noted. It is not within the remit of the Local Plan to deal with parking charges.
	Dobcross Village Community Association	The range of services does not necessarily need to be revised but major developments should have access to all or at least the majority of the services, rather than just 3 of them, as a standard part of the planning assessment. And the level of access should be as defined as 'very high'. The definition of 'high' access needs the frequency of bus services to be defined as at least 30 minutes. The Local Plan should stipulate that new housing development should only be where a location meets the higher levels of GMAL accessibility.	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments.

Full Name	Organisation Details	Summary of Response	Council's Response
Sarah Welsh	Peak District National Park Authority	Key services should include digital connectivity and greenspace. Both offer advantages to developments. The use of datasets like GMAL would offer a better measure of flexibility than the method used previously. The PDNPA adopted parking standards (2019) form an appendix to the PDNP Development Management Policies and feature a maximum and minimum standard that can be applied. This allows for consideration of the location and setting of the development, the likelihood of the displacement of parking into surrounding streets and existing access to alternative means of transport. Oldham Council could employ a similar approach.	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments and Policy T3 sets out the car parking standards which are maximum vehicle parking standards and minimum cycle parking for new developments, with different standards depending on the location and type of development.
Jean Betteridge	Oldham & Saddleworth Green Party	Support ambitious targets to reduce car use and make active travel and public transport the main ways of travelling. Policy should include GMAL and we support the move away from provision of car parking. Provision should be tailored to individual areas and developments. Agree that high access to public transport should be measured against buses in areas not reached by the Metro.	Noted. Draft Local Plan Policy T3 sets out the car parking standards which are maximum vehicle parking standards and minimum cycle parking for new developments, with different standards depending on the location and type of development.
Richard Clowes	TfGM	Key services need to be aligned with Policy 2 which defines community facilities as the intention is to help create sustainable communities where key services and community facilities are within walking or cycling distance of residential developments. The 20 minute neighbourhood principles and the Active Design principles also discussed in the Issues and Options paper also need to be aligned with these policies. Datasets like GMAL should be taken into account if this is likely to provide a more accurate measure of	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments and Policy T3 sets out the car parking standards which are maximum vehicle parking standards and minimum cycle parking for new developments, with different standards depending on the location and type of development.

Full Name	Organisation Details	Summary of Response	Council's Response
		<p>public transport accessibility for a particular location. In general TfGM would recommend that maximum vehicle parking standards and minimum cycle parking were set out for new developments however there may be occasions where you wish to retain a degree of flexibility dependent upon the type of application or the public transport accessibility of the location. There may be opportunities to implement a car free or car club only policy in the most accessible locations such as within Oldham town centre and TfGM would support such a policy.</p>	

Table TIC3: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response– 20 Minute Neighbourhood Question

Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	20 Minute Neighbourhood are not practical in a rural environment such as Saddleworth.	Noted.
Mrs Jane Millet		Leaving green areas along will help air pollution.	Noted.



Full Name	Organisation Details	Summary of Response	Council's Response
	Dobcross Village Community Association	The principles of Streets for All should be a thread that runs throughout the Local Plan, but with some specific policy statements to support this.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policy T2 in the Draft Local Plan on creating sustainable streets provides linkages back to JP-C4 and states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.
Joanne Harding	Home Builders Federation Ltd	Accepts the principles of the 20 minute neighbourhood, these principles may be appropriate as a thread throughout the Local Plan. It will be important to maintain flexibility and to ensure that it allows for the development of areas where there is the potential to create a 20 minute neighbourhood.	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments, the aim is to ensure that developments are in sustainable and accessible locations and that promote and encourage use of public transport, walking and cycling.
Jean Betteridge	Oldham & Saddleworth Green Party	The 20 minute neighbourhood principles should be embedded in the Local Plan as a thread that runs through the Plan, backed up by more detailed policies.	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments, the aim is to ensure that developments are in sustainable and accessible locations and that promote and encourage use of public transport, walking and cycling.
Richard Clowes	TfGM	Late Submission - The principles of a 20 minute neighbourhood are fundamental to achieving many of the objectives of the Local Plan. Ideally the principles should run throughout the Local Plan, however certain policies could be used as a way to ensure the 20 minute neighbourhood principles are implemented.	Noted. Draft Local Plan Policy CO9 sets out the approach with regards access to services and public transport accessibility for new developments, the aim is to ensure that developments are in sustainable and accessible locations and that promote and encourage use of public transport, walking and cycling.

Table TIC4: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – Electric Vehicle Questions

Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	All new developments should provide EV charging points. Also, EV charging points are needed throughout Saddleworth.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.
	Dobcross Village Community Association	All new developments should provide EV charging points. The standard should follow national guidance.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.
Joanne Harding	Home Builders Federation Ltd	Electric vehicles will be part of the solution to transitioning to a low carbon future. This proposed policy approach may be superseded by the Government's proposals to change Building Regulations and may not be needed.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.
Sarah Welsh	Peak District National Park Authority	The inability to be able to easily charge vehicles is one of the main deterrents for switching to BEVs. Even more so in locations where on-street parking / charging is limited. Providing charge points in all developments will future proof growth.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.
Joel Owen	First Choice Homes	Suggest a phased approach to providing electric charging points on developments, which reflects the projected annual percent take-up of electric vehicle ownership per household. The key component is that the provision of the electric point is built into the design so that at a later stage the plug element could be easily added.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.

<b>Full Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	All new developments should provide electric vehicle charging points.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.
Richard Clowes	TfGM	Late Submission - The GM Electric Vehicle Charging Infrastructure Strategy sets out guidance for charging points in new developments. For new residential development it recommends that all new dwellings should provide a charging point. Residential development proposing off-street parking but not designated to a particular dwelling should provide a minimum of 10% of the car parking spaces with active charge points and passive provision for a further 20% of car parking spaces. The same active and passive provision is recommended for all other development. The threshold is therefore determined by the level of car parking proposed by the development. In terms of the power supply this would largely be dependent on the type of development.	Noted. Draft Local Plan Policy T4 sets out the approach to electric vehicle charging points.

Table TIC4: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – Streets for All Questions

<b>Full Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	Impractical to apply Streets for All in a rural environment such as Saddleworth.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted

Full Name	Organisation Details	Summary of Response	Council's Response
		The creation of Active Neighbourhoods to be addressed in the Saddleworth Local Plan.	Places for Everyone will form part of Oldham's Local Plan. Policy T1 in the Draft Local Plan on Oldham's transport priorities states that new development should maintain and improve the Public Rights of Way network, in accordance with the Streets for All guidance and Policy T2 on creating sustainable streets provides linkages back to JP-C4 and states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.
	Dobcross Village Community Association	There should be a standalone policy for utilising the Streets for All guidance, which states it should be included as part of the assessment for both residential etc planning applications as well as general highway policy. All planning applications need to consider whether the development is positive or negative to the surrounding areas - not just for the new development itself - in the context of the Streets for All principles. The Local Plan process should look to identify Active Neighbourhood areas across all areas of Oldham including some in Saddleworth. There should also be a policy which supports their creation and considers creative ways of implementing the principles, such as streets closed other than for walking or cycling Sundays.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policy T1 in the Draft Local Plan on Oldham's transport priorities states that new development should maintain and improve the Public Rights of Way network, in accordance with the Streets for All guidance and Policy T2 on creating sustainable streets provides linkages back to JP-C4 and states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.
Sarah Welsh	Peak District National Park Authority	For the creation of Active Neighbourhoods to form a strong thread it is desirable to both identify them formally and to create an appropriate policy.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policy T1 in the Draft Local Plan on Oldham's transport priorities states that new development

Full Name	Organisation Details	Summary of Response	Council's Response
			should maintain and improve the Public Rights of Way network, in accordance with the Streets for All guidance and Policy T2 on creating sustainable streets provides linkages back to JP-C4 and states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.
Jean Betteridge	Oldham & Saddleworth Green Party	Support the development of a Streets for All policy both new and existing streets and with references integrated into general highways policy. We agree that the council should encourage the creation of Active Neighbourhoods.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policy T1 in the Draft Local Plan on Oldham's transport priorities states that new development should maintain and improve the Public Rights of Way network, in accordance with the Streets for All guidance and Policy T2 on creating sustainable streets provides linkages back to JP-C4 and states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.
Richard Clowes	TfGM	Late Submission - Streets for All Street Typology and user requirements covers all highways across Greater Manchester, TfGM would recommend that it is incorporated into a general Highway policy in the same way it is in PfE. May also require a policy that ensures that all access roads into new developments and all roads within new developments that are to be delivered by developers, are designed to be compliant with Streets for All principles.	Noted. Policy JP-C4 of Places for Everyone sets out how the design and management of streets should follow a Streets for All approach. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policy T1 in the Draft Local Plan on Oldham's transport priorities states that new development should maintain and improve the Public Rights of Way network, in accordance with the Streets for All guidance and Policy T2 on creating sustainable streets provides linkages back to JP-C4, ensuring that the design of any streets are in accordance with

Full Name	Organisation Details	Summary of Response	Council's Response
			TfGM's Streets for All design guidance and also states that new development shall be required to support the creation of sustainable streets, Active Neighbourhoods and School Streets.

Table TIC5: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – Bee Network Questions

Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Greater Manchester's Beelines Initiative offered cycling and walking infrastructure proposals. These included 80 new or upgraded crossings in Oldham with proposals that would enable 84% of the population to use Beelines. Sadly, the proposals offer nothing to benefit Saddleworth.	Noted. The Bee Network includes the buses, the Metrolink and will also include the train stations and some services in the future. This includes within the Saddleworth area.
	Dobcross Village Community Association	Yes, there should be a policy which specifies the Bee Network.	Noted. The introduction to the Creating a Sustainable, Active, Accessible Network for Oldham sets out that the Local Plan will facilitate the delivery of the Bee Network. The reasoned justification of Policy T1 on Oldham's Transport Priorities includes states the importance of the Bee Network.

Full Name	Organisation Details	Summary of Response	Council's Response
Sarah Welsh	Peak District National Park Authority	It would make sense to identify the Bee Network proposals on the Proposals Map. The map shows no connecting route to the National Park and it would be great to identify connections considering the amount of cars which head up to the Dove Stones Reservoir Area. If the Bee Network is seen as a key way of driving sustainable transport and 20-minute neighbourhoods, then the best way to ensure that development connects to the network is via a Local Plan policy.	Noted. The Bee Network is a Greater Manchester Network not a Local Plan designation.
Jean Betteridge	Oldham & Saddleworth Green Party	One cycle storage space per bedroom should be provided and a worked out Active Travel policy is needed.	Noted. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policies T1 and T2 of the Draft Local Plan set out the approach regarding active travel.
Richard Clowes	TfGM	Late Submission - TfGM can provide a better Bee Network map. Given the Bee Network proposals are widespread, TfGM suggest that the proposals map shows the 'confirmed infrastructure' only (ie. Oldham's sponsored schemes), otherwise there is a danger of showing proposals that currently have no committed funding. It is extremely important that new and existing developments connect with the Bee Network to offer existing residents active travel options and to avoid the creation of future car dependent neighbourhoods.	Noted.

Table TIC6: Responses submitted on the Transport and Improving Connectivity Chapter and the council's response – Active Design Questions

Full Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Clerk Saddleworth Parish Council	New housing developments should have a requirement to provide a public transport pass. One purpose-built cycle storage per home should be provided and there should be a stand alone policy for active travel.	Noted. Following the Issues and Options consultation it was decided that it is not appropriate for the Draft Local Plan to include a requirement for new housing to provide a public transport pass. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policies T1 and T2 of the Draft Local Plan set out the approach regarding active travel.
	Dobcross Village Community Association	New housing developments should have a requirement to provide a public transport pass.	Noted. Following the Issues and Options consultation it was decided that it is not appropriate for the Draft Local Plan to include a requirement for new housing to provide a public transport pass.
Joanne Harding	Home Builders Federation Ltd	Do not consider that it would be appropriate for new housing developments to be required to provide a public transport pass. Also do not consider that it would be appropriate for all new housing developments to provide new purpose-built cycle storage.	Noted. Following the Issues and Options consultation it was decided that it is not appropriate for the Draft Local Plan to include a requirement for new housing to provide a public transport pass.. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan.



Full Name	Organisation Details	Summary of Response	Council's Response
Sarah Welsh	Peak District National Park Authority	There is a danger that that providing a public transport pass is seen as another burden on the developer. However, if development is to be targeted at locations served by public transport then this would be a good way to promote its use. Cycle storage provision should at least match up with car parking provision in new developments. To ensure that families are able to travel together, cycle storage spaces should equal the number of bedrooms for family homes. Where there are properties with single bedrooms then storage should be provided for two people, possible through communal facilities. Provision should also ideally be made for visitors.	Noted. Following the Issues and Options consultation it was decided that it is not appropriate for the Draft Local Plan to include a requirement for new housing to provide a public transport pass. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan.
Joel Owen	First Choice Homes	Many local authorities require developers to contribute either one per household cycle voucher, bus or Metrolink pass this is often in addition to providing on site cycle storage of one per property. We are supportive of this being included within the Local Plan proposals but note that this in addition to other commuted sums and may therefore, impact on viability and deliverability.	Noted. Following the Issues and Options consultation it was decided that it is not appropriate for the Draft Local Plan to include a requirement for new housing to provide a public transport pass. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan.
Jean Betteridge	Oldham & Saddleworth Green Party	One cycle storage space per bedroom should be provided. A worked out Active Travel policy is needed, with references integrated in the general policy.	Noted. Policy JP-C4: Streets for All in Places for Everyone sets out the approach to setting aside space for cycle parking. Once adopted Places for Everyone will form part of Oldham's Local Plan. Policies T1 and T2 of the Draft Local Plan set out the approach regarding active travel.
Richard Clowes	TfGM	Late Submission - TfGM have previously trialed public transport passes as part of new developments with limited success, unaware of any evaluation of the trial.	Noted. Following the Issues and Options consultation it was decided that the Draft Local Plan will not include a requirement for new housing to provide a public transport pass.

## Communities Chapter

Table CO1: Responses submitted on the Communities Chapter and council's response – General

Name	Organisation Details	Summary of Response	Council's Response
Cllr Howard Sykes	Oldham Council	Recognise the importance of protecting heritage assets and assets of community value. The council should commit to maintaining the register of assets of community value. Communities should be actively encouraged to register those which they value, and fear may be lost. Recognise the important role that pubs play in community cohesion and socialisation, and wish to see a clear policy favouring, wherever possible, their retention as community hubs. In considering a proposal to demolish or convert a pub, the planning authority should apply the CAMRA Public House Viability Test. The council should commit to supporting residents and Parish Councils to register pubs as Assets of Community Value and to purchase such pubs as co-operative ventures should they fall empty and under threat.	Noted. The reasoned justification of Policy CO4 in the Draft Local Plan states that the <a href="#">Localism Act 2011</a> <sup>1</sup> allows local groups within a community (including Parish Councils) the right to identify and protect facilities that are important to them from immediate disposal. Communities can nominate a building or an area of land to be listed as an 'Asset of Community Value'. An asset can be privately or publicly owned and can vary from local shops and pubs, through to parks, open space areas and community centres.

<sup>1</sup> This Act can be found at: <https://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	The examples of social issues should also include food poverty.	Noted.

Table CO2: Responses submitted on the Communities Chapter and the council's response – Health and Wellbeing Question

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Sharon Hibbert	Saddleworth Parish Council	All developments should be required to do a Health Impact Assessment.	Noted. Policy CO7 in the Draft Local Plan sets out that all residential developments over 100 homes and all developments requiring an Equalities Impact Assessment (EIA) must be supported by a Health Impact Assessment (HIA) and that a HIA may be required for other developments where significant health implications are identified.
Mr RAAD RAAD AL-HAMDANI		Health considerations are an issue on some schemes irrespective of size. This applies in particular where housing is transformed into houses in multiple occupation. The effect on the local environment and the character of the area has to be given greater emphasis. This applies not only on the space allocation internally, but to common area and open spaces and to take account of proper provision of bin and cycle storage and screening as well as area of recreation and ensuring proper maintenance and management of gardens.	Noted. Policy CO7 in the Draft Local Plan sets out that all residential developments over 100 homes and all developments requiring an Equalities Impact Assessment (EIA) must be supported by a Health Impact Assessment (HIA) and that a HIA may be required for other developments where significant health implications are identified.

Table CO3: Responses submitted on the Communities Chapter and the council's response – Health and Wellbeing Spatial Option

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Saddleworth Parish Council	Hot food takeaways should be restricted within 400m of schools and in areas with high levels of obesity.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of hot food takeaways. In addition, there are a number of criteria listed that the proposals must demonstrate that they meet.
Ms Deborah Wroe		Hot food takeaways should be restricted within 400m of schools and in areas with high levels of obesity.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of hot food takeaways. In addition, there are a number of criteria listed that the proposals must demonstrate that they meet.
Mrs Jane Millet		Perhaps just a restriction in the numbers, there are a huge amount if take away's in the town centre	Noted. Policy C4 in the Draft Local Plan sets out a number of criteria that have to met for non-main town centre uses to be supported within our centres. This includes hot food takeaway and one of the criteria is that it does not result in an over concentration of non-main town centre uses.

Name	Organisation Details	Summary of Response	Council's Response
	Kentucky Fried Chicken (Great Britain) Limited	Should not restrict hot food takeaways, there is evidence for proximity-based policies is weak and conflicting. Should such a policy be considered, then, based on the assumed mechanism of action, such policies need only to restrict opening at lunchtimes around secondary schools that allow pupils to leave the premises during the day and for a period while pupils disperse after the school closes for the day.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of hot food takeaways.
Ms Deborah Wroe		Hot food takeaways should be restricted within 400m of schools and in areas with high levels of obesity.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of said of hot food takeaways. In addition, there are a number of criteria listed that the proposals must demonstrate that they meet.
Mr RAAD RAAD AL-HAMDANI		There should be no assumption made that take away outlets will only serve cheap fast food.	Noted.
Cllr Howard Sykes	Oldham Council	Strongly support this. Provided statistics on obesity and health related issues, including in Oldham.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of said of hot food takeaways. In addition, there are a number of criteria listed that the proposals must demonstrate that they meet.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Jean Betteridge	Oldham & Saddleworth Green Party	Hot food takeaways should be restricted within 400m of schools and in areas with high levels of obesity. Health Impact assessments should be mandated for all developments.	Noted. Policy CO8 in the Draft Local Plan sets out the approach with regards Hot Food Takeaways. It states that outside the designated centres, proposals for hot food takeaways within 400m of the principal entry point to a secondary school or sixth form college, will only be granted permission if it would not result in a proliferation of said of hot food takeaways. In addition, there are a number of criteria listed that the proposals must demonstrate that they meet. Policy CO7 in the Draft Local Plan sets out that all residential developments over 100 homes and all developments requiring an Equalities Impact Assessment (EIA) must be supported by a Health Impact Assessment (HIA) and that a HIA may be required for other developments where significant health implications are identified.

Table CO4: Responses submitted on the Communities Chapter and the council's response – Social Infrastructure Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Noel Mahon	Save Royton's Green Belt Community Group	The definition of community facilities should not be expanded to include the likes of pubs.	Noted. The glossary for the Draft Local Plan defines community uses as the uses listed within national planning policy. The list includes pubs.
Mrs Sharon Hibbert	Saddleworth Parish Council	Should protect some suitable sites for potential future education facilities/ services. Community facilities should include pubs, churches, libraries and schools. There should be the requirement of written statement justifying the loss any community facility and detailing	Noted. Draft Local Plan Policy CO4 sets out the ways in which community facilities will be protected. At this stage there are no Article 4 Directions proposed. Policy IN3 sets out the approach regarding Social Value.

Name	Organisation Details	Summary of Response	Council's Response
		efforts to continue its current use. The council should focus on a policy for Saddleworth Parish Council with regards the loss of community facilities. Community facilities in rural locations should be subject to Article 4 Directions. The Local Plan should include a specific policy in relation to ensuring that new developments provide social value.	
Mr RAAD RAAD AL-HAMDANI		There should be the opportunity for places to change their use over time otherwise they stultify. If there is local enthusiasm for the protection of certain facilities then the use of the register of community assets allows for their protection. The production of a list of sites suitable for development as schools or other facilities that allows for the integration of such facilities with transport, housing, and other infrastructure considerations such as flooding, services and links to open space would be an excellent idea.	Noted. The reasoned justification of Policy CO4 in the Draft Local Plan states that the <a href="#">Localism Act 2011</a> <sup>2</sup> allows local groups within a community (including Parish Councils) the right to identify and protect facilities that are important to them from immediate disposal. Communities can nominate a building or an area of land to be listed as an 'Asset of Community Value'. An asset can be privately or publicly owned and can vary from local shops and pubs, through to parks, open space areas and community centres. The policy sets out how community facilities will be protected and the criteria that should be met in order to change use.
	Russell LDP	Welcomes the facilitation of social value within the replacement Oldham Local Plan. Details of how Stakehill site will deliver this are provided.	Noted. Draft Local Plan Policy IN3 sets out the approach regarding Social Value.
	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Will work closely with the council to determine the appropriate provision and/or contributions to support any improvements required to local services and infrastructure.	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-">https://www.greatermanchester-</a>

<sup>2</sup> This Act can be found at: <https://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

Name	Organisation Details	Summary of Response	Council's Response
			<a href="https://www.ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information.
Joel Owen	First Choice Homes	FCOH are committed to generating social value from procurement of new build developments and welcomes an opportunity to have an integrated and joined up Oldham approach to Social Value but based on specific local areas requirements.	Noted. Draft Local Plan Policy IN3 sets out the approach regarding Social Value.
Jean Betteridge	Oldham & Saddleworth Green Party	Pubs should be included as a community facility. Cafes that serve a similar purpose in some areas and for some sections of the community should also be included. The loss of community facilities should be restricted wholesale and the council should deal with their loss on a borough wide basis. Agree with article 4 direction in rural areas and a social value in developments policy.	Noted. The glossary for the Draft Local Plan defines community uses as the uses listed within national planning policy. The list includes pubs. Draft Local Plan Policy CO4 sets out the ways in which community facilities will be protected. At this stage there are no Article 4 Directions proposed. Policy IN3 sets out the approach regarding Social Value.

Table CO4: Responses submitted on the Communities Chapter and the council's response– Local Environment Question

Name	Organisation Details	Summary of Response	Council Response
Mr and Mrs Briggs		Support the current Local Plan, in 'Policy of Local Environment'.	Noted.
Ms Deborah Wroe		Only separate the local environment policy if the policy currently is a convenient work around to ensure something has been considered, even if all haven't.	Noted.



Name	Organisation Details	Summary of Response	Council Response
Mrs Melanie Lindsley		Within the Oldham Council area are past coal mining legacy features present at surface and shallow depth which pose a potential risk to surface stability and public safety. The Coal Authority considers that a separate policy dealing with unstable, and possibly contaminated land, should be included in the Local Plan.	Noted. Policy LE2 in the Draft Local Plan sets out the approach in relation to unstable and contaminated land.
Mrs Sharon Hibbert	Saddleworth Parish Council	The Local Plan should have separate policies dealing with amenity, hazards, road safety and community safety.	Noted. The Draft Local Plan has several design policies in the Creating and Better and Beautiful Oldham section, Policy LE1 on noise pollution and vibrations, Policy OL5 regarding the protection of dark skies, as well as policies within the Creating a Sustainable, Active, Accessible Network for Oldham section that cover road safety.
Mr RAAD RAAD AL-HAMDANI		The Local Plan should have separate policies dealing with amenity, hazards, road safety and community safety.	Noted. The Draft Local Plan has several design policies in the Creating and Better and Beautiful Oldham section, Policy LE1 on noise pollution and vibrations, Policy OL5 regarding the protection of dark skies, as well as policies within the Creating a Sustainable, Active, Accessible Network for Oldham section that cover road safety.
Sylvia Whittingham	Environment Agency	Late Submission - Would expect the Local Plan to consider the impacts any development may have in relation to contamination at the site and detail any required mitigation measures to prevent an adverse impact on the water environment. In addition, where historic uses have led to contamination of the soils and/or groundwater beneath the site, the developer should address risks posed to controlled waters.	Noted. Policy LE2 in the Draft Local Plan sets out the approach in relation to contaminated land.

Name	Organisation Details	Summary of Response	Council Response
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Supportive of a policy relating to amenity. This should be fully reflective of the agent of change principle.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.
Jean Betteridge	Oldham & Saddleworth Green Party	The Local Plan should have separate policies dealing with amenity, hazards, road safety and community safety.	Noted. The Draft Local Plan has several design policies in the Creating and Better and Beautiful Oldham section, Policy LE1 on noise pollution and vibrations, Policy OL5 regarding the protection of dark skies, as well as policies within the Creating a Sustainable, Active, Accessible Network for Oldham section that cover road safety.

Table CO5: Responses submitted on the Communities Chapter and the council’s response – Agent of Change Question

Name	Organisation Details	Summary of Response	
Mrs Sharon Hibbert	Parish Clerk Saddleworth Parish Council	The council should introduce an agent of change policy.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.
Mr RAAD RAAD AL-HAMDANI		Mitigation by its nature can only reduce rather than eliminate adverse effects. In addition to allowing certain development if adequate mitigation is possible, there should also be a list of forbidden developments in certain area irrespective of mitigation.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.
Submitted by Chorlton Planning on behalf of a number of clients. List of clients set out in Appendix 1.		Strongly request that an agent of change is included as a policy or at least guidance.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.
Jean Betteridge	Oldham & Saddleworth Green Party	The council should introduce an agent of change policy.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Supportive of an agent of change policy and this should have full regard to our existing wastewater treatment works.	Noted. The Draft Local Plan Policy LE1 on noise pollution and vibrations sets out the approach regarding the agent of change principle in that the council will not support proposals where new residents would be likely to raise complaints about neighbouring existing uses.

## Infrastructure Chapter

Table IN1: Responses submitted on the Infrastructure Chapter and the council's response – Other Comments

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mrs Wendy Cooper	Save Shaw Greenbelt Group	The council should produce a Planning Obligations SPD that explicitly outlines Section 106 agreements. Financial contributions should be channelled into the infrastructure and public services that serve the community where the development occurred.	Noted. The Draft Local Plan includes IN2 on planning obligations. There are currently no plans to produce a Planning Obligations SPD, however this will be kept under review.
Katherine Grant		Developments must give more to the local community. It should be part of the Local Plan that developments over a certain size must contain an enhancement for the local community.	Noted. Draft Local Plan Policy IN3 sets out the approach regarding Social Value.

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr Adam Brennan	United Utilities Water Limited	Late Submission - Recommended policy wording suggested. Highlight that it owns assets which are currently situated in the Green Belt / Open Countryside on the adopted proposals map and upgrades to these assets may be required. It is requested that local policy is worded to recognise that utility sites, located within the Green Belt or open countryside, are appropriate for development for operational purposes. Preference would be for this principle to be reflected on the proposals map and in development plan policy. Recommended policy wording suggested.	Noted. The Draft Local Plan does not address strategic Green Belt boundary revisions or propose to allocate greenfield sites in the Green Belt for development.

Table IN2: Responses submitted on the Infrastructure Chapter and council's response – Infrastructure Questions

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr and Mrs Briggs		Support Oldham requiring a specific policy to deliver the necessary infrastructure to support new development.	Noted. The Draft Local Plan includes IN2 on planning obligations.
Kevin Hatherill		Oldham Council should produce a Planning Obligations SPD that features the Section 106 agreements. It is critical that new infrastructure includes an uplift to the capacity of local amenities and public services. New infrastructure projects (including housing) should require sufficient financial contributions to uplift the capacity of local amenities and public services.	Noted. The Draft Local Plan includes IN2 on planning obligations. There are currently no plans to produce a Planning Obligations SPD, however this will be kept under review.

Name	Organisation Details	Summary of Response	Council's Response
Mrs Sharon Hibbert	Parish Clerk Saddleworth Parish Council	Oldham should require a specific policy to deliver the necessary infrastructure to support new development.	Noted. The Draft Local Plan includes IN2 on planning obligations.
Brian Beedham		Before developments, enhancement to infrastructure must be considered and agreed with members of the population affected by the development.	Noted.
Lisa Smirk	Save Shaw's Green Belt	Currently the infrastructure in Oldham is insufficient to service existing housing stock, let alone the proposed 10,000 additional new builds in PfE.	Noted.
Jean Betteridge	Oldham & Saddleworth Green Party	In the light of recent developments Oldham requires a specific policy that seeks the development of supporting necessary infrastructure and ensuring it supports the environmental aims of the Local Plan. Oldham should continue to have a policy regarding Telecommunications.	Noted. The Draft Local Plan includes IN2 on planning obligations. Whilst Policy IN1 sets out a policy with regards digital infrastructure and telecommunications.
Darryl Nolan		Developers must pay significantly for improvements and infrastructure on any developments they make.	Noted. The Draft Local Plan includes IN2 on planning obligations.
Mr Adam Brennan	United Utilities Water Limited	Late Submission - United Utilities recommends that Oldham does need a policy regarding infrastructure provision.	Noted. The Draft Local Plan includes IN2 on planning obligations.

Table IN3: Responses submitted on the Infrastructure Chapter and the council's response – Infrastructure Questions

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Royton's Green Belt Community Group	The council should produce a Planning Obligations SPD that explicitly outlines Section 106 agreements. Financial contributions should be channelled into the infrastructure and public services that serve the community where the development occurred.	Noted. The Draft Local Plan includes IN2 on planning obligations. There are currently no plans to produce a Planning Obligations SPD, however this will be kept under review.
Mrs Sharon Hibbert	Saddleworth Parish Council	The council should have a policy that seeks to deliver the necessary infrastructure required to support new development. Specific infrastructure requirements need to be a part of Saddleworth Parish Councils plan. The policies should explain the methodology.	Noted. The Draft Local Plan includes IN2 on planning obligations.
Mrs Wendy Cooper	Save Shaw Greenbelt Group	The council should produce a Planning Obligations SPD that explicitly outlines Section 106 agreements. Financial contributions should be channelled into the infrastructure and public services that serve the community where the development occurred.	Noted. The Draft Local Plan includes IN2 on planning obligations. There are currently no plans to produce a Planning Obligations SPD, however this will be kept under review.
Mr M Coulter	Grasscroft Properties Ltd	A policy that provides a formula and clarity over what planning obligations will likely be sought is supported. The Plan needs to be deliverable and any policy in relation to planning obligations will need to be written in accordance with Regulation and national planning policy. The wording of any policy should be flexible to allow for changes requirements and also allow development to come forward where viability evidence demonstrates that it would not be viable to provide a fully compliant scheme.	Noted. The Draft Local Plan includes IN2 on planning obligations.

Name	Organisation Details	Summary of Response	Council's Response
	Countryside Properties	A policy that provides a formula and clarity over what planning obligations will likely be sought is supported. The Plan needs to be deliverable and any policy in relation to planning obligations will need to be written in accordance with Regulation and national planning policy. The wording of any policy should be flexible to allow for changes requirements and also allow development to come forward where viability evidence demonstrates that it would not be viable to provide a fully compliant scheme.	Noted. The Draft Local Plan includes IN2 on planning obligations.
	Kellen Homes	Any policy addressing developer contributions should allow for flexibility and site-specific circumstances such as development viability to be considered. Any policy should be clear where planning obligations are going to be sought and how the planning obligations will be calculated.	Noted. The Draft Local Plan includes IN2 on planning obligations.
The Casey Group	The Casey Group	Response makes reference to land interest at Broadbent Moss within PfE. Support the council in adopting a Planning Obligations SPD which clearly explains the rationale and methodology for how planning obligations are calculated.	Noted. The Broadbent Moss site is a strategic allocation (JPA14) proposed as part of Places for Everyone which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/">https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/</a> for further information. The Draft Local Plan includes IN2 on planning obligations. There are currently no plans to produce a Planning Obligations SPD, however this will be kept under review.
Lisa Smirk	Save Shaw's Green Belt	The council should produce a Planning Obligations SPD that explicitly outlines Section 106 agreements. Financial contributions should be channelled into the infrastructure and public services that serve the community where the development occurred.	The Broadbent Moss site is a strategic allocation (JPA14) proposed as part of Places for Everyone which is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-">https://www.greatermanchester-ca.gov.uk/what-we-</a>



Name	Organisation Details	Summary of Response	Council's Response
			do/planning-and-housing/places-for-everyone/ for further information.

## Monitoring

Table M1: Responses submitted on the Monitoring Chapter and the council's response

Name	Organisation Details	Summary of Response	Council's Response
Noel Mahon	Save Royton's Green Belt Community Group	Would like to see the following indicators added: Windfall completions, Net change in open space, Net change in underused and derelict land, Number of Air Quality Management Areas, and Number of Air Quality Management Areas that exceed legal limits	Noted. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators: <ul style="list-style-type: none"> <li>• Total completions on housing allocations and non-allocated sites</li> <li>• Number of days in Greater Manchester where air pollution was moderate or higher</li> <li>• Annual mean nitrogen dioxide</li> <li>• Per capita emission estimates, industry, domestic and transport sectors</li> </ul>
	Historic England	Indicators 10 and 12 are useful in understanding the effectiveness of conservation management. Indicators 9 and 11 in themselves may not tell the full picture and need to be set against a more detailed context	Noted. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators: <ul style="list-style-type: none"> <li>• Number of heritage assets on the National Heritage List for England</li> </ul>

Name	Organisation Details	Summary of Response	Council's Response
		such as the condition of assets. Other useful indicators could relate to surveying the condition of mills and keep this updated as feasible.	<ul style="list-style-type: none"> <li>• Number of entries on the English Heritage 'Heritage at Risk Register'</li> <li>• Number/ extent of Conservation Areas</li> <li>• Number of listed buildings and number of buildings in conservation areas lost through new development proposals</li> </ul>
Mrs Sharon Hibbert	Saddleworth Parish Council	Suggest that Indicator 9 read, "Number location and condition of heritage assets listed on the national Heritage List for England" and Indicator 51 read "Number of Empty Homes by Electoral ward". Suggest indicator on flytipping statistics, associated costs and number of prosecutions.	<p>Noted. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators:</p> <ul style="list-style-type: none"> <li>• Number of heritage assets on the National Heritage List for England</li> <li>• Number of vacant properties</li> </ul>
Mrs Jane Millet		Extent of open spaces. Beal Valley is a vast open space this has obviously not been reviewed otherwise the nature content would have been observed and perhaps a knowledgeable decision would have made.	<p>Noted. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators:</p> <ul style="list-style-type: none"> <li>• Number of planning applications that result in the gain or loss of identified open space</li> <li>• Quantity of identified open space per 1000 population</li> <li>• Accessibility to open space in the borough by typology</li> </ul>
Sylvia Whittingham	Environment Agency	In regard to indicators based on forthcoming Environment Bill Identifying developments that achieve over and above the required 10%	<p>Noted. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators:</p> <ul style="list-style-type: none"> <li>• Reporting on delivery of BNG</li> </ul>

Name	Organisation Details	Summary of Response	Council's Response
		BNG. No of Hectares of offsite BNG habitat created in borough.	<ul style="list-style-type: none"> <li>• Number of offsite BNG habitat created in the borough (on council owned land)</li> </ul>
Jean Betteridge	Oldham & Saddleworth Green Party	The following indicators should be added: Number of food banks, number and range of people using them. Impact of planning decisions on carbon emissions and climate change. Percentage tree cover.	<p>Noted. The number of foodbanks and number / range of people using them is not within the remit of the Local Plan. The Draft Local Plan sets out a proposed monitoring framework that includes the following indicators:</p> <ul style="list-style-type: none"> <li>• Percentage of tree cover</li> <li>• Number of days in Greater Manchester where air pollution was moderate or higher</li> <li>• Annual mean nitrogen dioxide</li> <li>• Per capita emission estimates, industry, domestic and transport sectors</li> </ul>
	Natural England	Late Submission - Advise that monitoring indicators should meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. Suggest the following indicators be added - Biodiversity: Number of planning approvals that generated any significant biodiversity impacts on sites of acknowledged biodiversity importance. Percentage of the planning approvals likely to have an impact on wildlife, which the Council negotiated provisions for a net gain in biodiversity. Number of planning applications refused or withdrawn in part due to their lack of	<p>Noted. The Draft Local Plan sets out a proposed monitoring framework that includes several indicators that relate to the natural environment, including:</p> <ul style="list-style-type: none"> <li>• Single data list 160-00 Proportion of local sites where positive conservation management is being or has been implemented</li> <li>• Change in areas of biodiversity designations (i.e. SBI updates)</li> <li>• Reporting on delivery of BNG</li> <li>• Number of offsite BNG habitat created in the borough (on council owned land)</li> </ul>

Name	Organisation Details	Summary of Response	Council's Response
		<p>consideration of biodiversity impacts. Number of planning applications which achieve biodiversity net gain. Green Infrastructure: To work towards ensuring that the city's population have access to a natural greenspace within 400 metres of their home. Length of greenways constructed be taken into account Hectares of accessible open space per 1000 population.</p>	<ul style="list-style-type: none"> <li>Percentage of tree cover</li> </ul>

## General Comments

Table G1: Summary of Comment's and the Council's response – General Comments

Name	Organisation Details	Summary of Response	Council's Response
	Homes England	Homes England does not wish to make any representations on the above consultation.	Noted.
Godfrey Adams		Agree with all the headings. However, feel an opportunity is being missed for a new start science park. Dovestones or a place like Dovestones would be a good location.	Noted.
Sarah Welsh	Peak District National Park Authority	Set out several places within the Local Plan that would like to see references made to the Peak District National Park (PDNPA).	Noted. There is Policy OL1 in the Draft Local Plan on the Consideration for the Peak District National Park and other references throughout the plan.
Denise Luke		Sets out a number of issues facing Oldham including a declining town centre, a loss of local services, pressures on health, transport network for cars is overloaded, public transport system has been reduced, open spaces and OPOL under pressure, redundant land not developed, failed projects (e.g. Mumps) that waste revenue. Support Creating a Better Place particularly town centre regeneration, housing and new jobs.	Noted.
Russell LDP		Russell LDP is seeking to deliver an employment development on land south of the Stakehill Industrial Estate. Would like to ensure that policies	Noted. Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <a href="https://www.greatermanchester-ca.gov.uk/what-we-">https://www.greatermanchester-ca.gov.uk/what-we-</a>

Name	Organisation Details	Summary of Response	Council's Response
		in the Local Plan are consistent with PfE and does not duplicate policies.	<a href="#">do/planning-and-housing/places-for-everyone/</a> for further information.
Tracy Woodward	Save Chadderton's Greenbelt Committee.	Sets out several ways in which they believe consultation has failed to meet the published standards of effective consultation, cooperation and co-production which are meant to guide the work of public institutions.	Noted. The consultation was carried out in line with the council's adopted Statement of Community Involvement.

Name	Organisation Details	Summary of Response	Council's Response
Mr Adam Brennan	United Utilities Water Limited	<p>New development should be focused in sustainable locations which are accessible to local services and infrastructure. Do not normally permit development over or in proximity to UU assets. Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. May be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements. For larger sites, recommend that policy requires applicants to prepare an infrastructure phasing and delivery strategy.</p>	<p>Draft Local Plan Policy CO9 sets out how the council will support development proposals that are in sustainable and accessible locations. Where it is considered appropriate to require the preparation of infrastructure phasing and delivery strategies as part of allocations proposed in the Local Plan this will be set out within the associated policy wording that is to be prepared to support each of the allocations at Publication plan stage. Policy IN2 Planning Obligations also sets out our approach to securing planning obligations and PfE Policy JP-D1 sets out requirements regarding infrastructure implementation.</p>

Name	Organisation Details	Summary of Response	Council's Response
Mr John Shepherd		Oldham has declined and will continue to decline. Includes two newspaper clippings from the 1970s and states nothing has changed or improved since then.	Noted.
Ms Rose Butera		Poem(s) regarding environmental concerns of development submitted.	Noted.
Mrs Tracy Woodward		Sets out several ways in which they believe consultation has failed to meet the published standards of effective consultation, cooperation and co-production which are meant to guide the work of public institutions. Support for respecting landscape types, prioritising affordable housing, preserving our heritage (especially Foxdenton Hall), improving bus services, increasing biodiversity, thriving town centres, improving air quality, developing brownfield sites and a Mills Strategy, improving access to Tandle Hill.	Noted. The consultation was carried out in line with the council's adopted Statement of Community Involvement.
Jeanette Hull		Outlines ways they believe the process of consultation has not been fit for purpose.	Noted. The consultation was carried out inline with the council's adopted Statement of Community Involvement.
Ms Deborah Wroe		Comments that the document is not plain in Plain English and is difficult to read.	Noted. Every effort will be made to present the planning documents in Plain English and user-friendly, however sometimes given the nature of the documents and the need to set out technical and detailed information this is not always possible,



<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Greg Hull		Sets out several ways in which they believe consultation has failed to meet the published standards of effective consultation, cooperation and co-production which are meant to guide the work of public institutions. Support for respecting landscape types, prioritising affordable housing, preserving our heritage (especially Foxdenton Hall), improving bus services, increasing biodiversity, thriving town centres, improving air quality, developing brownfield sites and a Mills Strategy, improving access to Tandle Hill.	Noted. The consultation was carried out in line with the council's adopted Statement of Community Involvement.
Jackie Copley	Campaign to Protect Rural England	Late Submission - Comments on issues concerning the climate emergency and the value of the countryside. Outlines the role of CPRE and what they are working towards.	Noted.

Table G2: Responses submitted that relate to planning applications

<b>Name</b>	<b>Organisation Details</b>	<b>Summary of Response</b>	<b>Council's Response</b>
Mr Anthony Faulkner		Comments submitted relate to a planning application at Cowlshaw.	Noted.
Linda Murphy		Objections provided in relation to a planning application at Knowls Lane.	Noted.
Renny Krupinski		Objections then provided in relation to a planning application at Knowls Lane.	Noted.

Table G3: Responses submitted objecting to Places for Everyone Joint Plan

During the Issues and options consultation various comments were received in relation to the Places for Everyone Publication Plan 2021 consultation. These respondents were directed to the Greater Manchester Combined Authority website as Places for Everyone is being prepared through a separate process to the review of Oldham's Local Plan. Please see <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/> for further information.

Name	Organisation Details	Summary of Response
Lynne Kovacs		Response is an objection to Places for Everyone / GMSF.
Mrs Juliet Thompson		Response is an objection to Places for Everyone / GMSF.
Mrs Jane Millet		Response is an objection to Places for Everyone / GMSF.
Trevor Widdup		Response is an objection to Places for Everyone / GMSF.
Nick Armbrister		Response is an objection to Places for Everyone / GMSF.
Mrs Liane Robinson		Response is an objection to Places for Everyone / GMSF.
Mrs Victoria Sharp		Response is an objection to Places for Everyone / GMSF.
Miss Beth Sharp		Response is an objection to Places for Everyone / GMSF.
Mrs Tracy Kimpton		Response is an objection to Places for Everyone / GMSF.
Mr Jacob Sharp		Response is an objection to Places for Everyone / GMSF.
Michelle Smithies		Response is an objection to Places for Everyone / GMSF.
Neil Shoreman		Response is an objection to Places for Everyone / GMSF.
Mr and Mrs Rustidge		Response is an objection to Places for Everyone / GMSF.
Doug Hoy		Response is an objection to Places for Everyone / GMSF.
Michelle Liddle		Response is an objection to Places for Everyone / GMSF.
Dr and Mrs Wilkinson		Response is an objection to Places for Everyone / GMSF and outlines ways they believe the process of consultation has not been fit for purpose.
Daniel Arthurs		Response is an objection to Places for Everyone / GMSF.
Victoria Banyard		Response is an objection to Places for Everyone / GMSF.
Tricia Pollard		Response is an objection to Places for Everyone / GMSF.
S Johnson		Response is an objection to Places for Everyone / GMSF.
Emily Edwards		Response is an objection to Places for Everyone / GMSF.

Name	Organisation Details	Summary of Response
Iain Western		Response is an objection to Places for Everyone / GMSF.
Lisa Smirk	Save Shaw's Green Belt	Portal is not user friendly. Information submitted regarding the Groups views and objections in relation to PfE.
Martin and Sharon Emmott		Response is an objection to Places for Everyone / GMSF and outlines ways they believe the process of consultation has not been fit for purpose.
Ms Gillian Holden		Response is an objection to Places for Everyone / GMSF.
Christine and Lauren Beatty		Response is an objection to Places for Everyone / GMSF.

## Appendix 1

### Chorlton Planning Clients:

J. Downs  
Quantum Star  
Mrs Corbett  
D. Hind  
D. Vick  
BH. Tomlinson  
P. Lutener  
M. Megson  
Connell Group  
K. Harvey  
A. Hegab  
K. Henthorn  
A. Lord  
S. Ingham  
Tanner Brothers  
Dronsfield Mercedes  
E. Connell  
Anwyl Homes  
K. McAvoy  
D. Winterbottom  
P. Haworth  
W. Clarke  
Z. Iqbal